

**Facesheet: 1. Request Information (1 of 2)**

**A.** The State of North Carolina requests a waiver/amendment under the authority of section 1915(b) of the Act. The Medicaid agency will directly operate the waiver.

**B. Name of Waiver Program(s):** Please list each program name the waiver authorizes.

| Short title (nickname) | Long title  | Type of Program |
|------------------------|---|-----------------|
| State of North C       | State of North Carolina NC MH/IDD/SAS Health Plan | PIHP;           |

**Waiver Application Title** (optional - this title will be used to locate this waiver in the finder):

2018 Renewal Waiver

**C. Type of Request.** This is an:



**Renewal request.**



**This is the first time the State is using this waiver format to renew an existing waiver.**

The renewal modifies (Sect/Part):



**Migration Waiver** - this is an existing approved waiver



**Renewal of Waiver:**

Provide the information about the original waiver being renewed

**Base Waiver Number:**

0002

**Amendment Number** (if applicable):

**Effective Date:** (mm/dd/yy)

08/01/13

**Requested Approval Period:** (For waivers requesting three, four, or five year approval periods, the waiver must serve individuals who are dually eligible for Medicaid and Medicare.)



**1 year**



**2 years**



**3 years**



**4 years**



**5 years**

**Draft ID:** NC.042.05.00

**Waiver Number:** NC.0002.R05.00

**D. Effective Dates:** This renewal is requested for a period of 5 years. (For beginning date for an initial or renewal request, please choose first day of a calendar quarter, if possible, or if not, the first day of a month. For an amendment, please identify the implementation date as the beginning date, and end of the waiver period as the end date)

**Proposed Effective Date:** (mm/dd/yy)

07/01/19

**Proposed End Date:** 06/30/24

Calculated as "Proposed Effective Date" (above) plus "Requested Approval Period" (above) minus one day.

**Approved Effective Date:** 07/01/19

**Facesheet: 2. State Contact(s) (2 of 2)**

**E. State Contact:** The state contact person for this waiver is below:

**Name:**

Deborah Goda

**Phone:**

(919) 855-4297

**Ext:**



**TTY**

**Fax:**

(919) 715-9451

**E-mail:**

deborah.goda@dhhs.nc.gov

**If the State contact information is different for any of the authorized programs, please check the program name below and provide the contact information.**

**The State contact information is different for the following programs:**



**State of North Carolina NC MH/IDD/SAS Health Plan**

*Note: If no programs appear in this list, please define the programs authorized by this waiver on the first page of the*

## Section A: Program Description

### Part I: Program Overview

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#### **Tribal consultation.**

For initial and renewal waiver requests, please describe the efforts the State has made to ensure Federally recognized tribes in the State are aware of and have had the opportunity to comment on this waiver proposal.

Tribal officials of the Eastern Band of the Cherokee Indians (ECBI), which is the only federally recognized tribe in NC, were notified of the 1915(b) waiver renewal on September 4, 2018 via email with an attachment of the renewal application. The ECBI responded with several comments. These comments were taken into consideration and the renewal application was revised as appropriate.

#### **Program History.**

For renewal waivers, please provide a brief history of the program(s) authorized under the waiver. Include implementation date and major milestones (phase-in timeframe; new populations added; major new features of existing program; new programs added).

In 2001, the NC General Assembly initiated reform of the State's mental health, intellectual and developmental disabilities, and substance use disorder (MH/IDD/SUD) services delivery system through Session Law 2001-437, resulting in the separation of service management and service delivery. Previously, MH/IDD/SUD county programs and area authorities delivered services directly. The 2001 legislation required these programs and authorities to divest of direct services provision, contract with other public and private providers for service delivery, and change their focus exclusively to management and oversight. County programs and area authorities became local management entities (LMEs) as described in NCGS 122C-117 [https://www.ncleg.net/enactedlegislation/statutes/html/bychapter/chapter\\_122c.html](https://www.ncleg.net/enactedlegislation/statutes/html/bychapter/chapter_122c.html)

In April 2005, North Carolina began a pilot project using 1915 (b)/(c) waiver authorities in five North Carolina counties. The pilot project was administered by Piedmont Behavioral Healthcare (PBH) LME. The pilot program allowed the LME to operate as a Prepaid Inpatient Health Plan (PIHP) for Medicaid MH/IDD/SUD services. All Medicaid enrollees in the eligibility groups covered under the waiver and residing in the LME's catchment area were mandatorily enrolled in the PIHP on April 1, 2005.

Note: PBH changed its name to Cardinal Innovations Healthcare Solutions in November 2012, and then to Cardinal Innovations Healthcare in May 2016.

During the first year of operation, the waiver program had generated savings through care and utilization management strategies. The state received approval from CMS in December 2006 to invest these savings in 1915(b)(3) services for Medicaid enrollees in the pilot area. The (b)(3) service package contained cost-effective, supplemental services and supports aimed at decreasing hospitalizations and helping individuals remain in or return to their homes and communities when preferred and appropriate.

The NC Department of Health and Human Services (DHHS) submitted amendments to the 1915 (b) and the NC Innovations 1915 (c) waivers to CMS in December 2009 requesting approval to expand the program statewide. This would standardize care management and service delivery for Medicaid enrollees with MH/IDD/SUD. Both waiver amendments were approved and effective April 1, 2013. NC Session Laws 2011-264 and 2012-151 required statewide expansion of the 1915(b)/(c) waiver program through local management entities (LMEs) by July 1, 2013 and amended NC General Statute 122C to describe new requirements for LMEs that wished to participate in the waiver programs. LMEs were required to have a population of at least 300,000 by July 1, 2012 and 500,000 by July 1, 2013. The Statute provides for LME mergers and inter-local agreements between LME, with one LME designated as lead for waiver operations, to reach the population requirements. All LME applicants participated in an RFP process and were subject to readiness reviews and successful implementation of any required corrective action plans before being approved for waiver participation.

The original 11 LMEs (now PIHPs) have experienced multiple mergers and consolidations since April 1, 2013, reducing their number to 7, as well as several name changes. These changes are as follows:

Cardinal Innovations (formerly known as PBH):

- Cabarrus, Davidson, Rowan, Stanley and Union Counties were the original counties included in the pilot.
- Alamance and Caswell counties were added October 1, 2011.
- Franklin, Vance, Granville, Warren & Halifax counties were added January 1, 2012.
- Orange, Person, and Chatham counties were added April 1, 2012.
- PBH changed its name to Cardinal Innovations Healthcare Solutions in November 2012
- Mecklenburg County (formerly MeckLink) was added April 1, 2014.
- Davie, Forsyth, Rockingham and Stokes Counties were added July 1, 2015 as a result of a merger between CenterPoint Human Services and Cardinal Innovations Healthcare Solutions.
- Cardinal Innovations Healthcare Solutions changed its name to Cardinal Innovations Healthcare in May 2016

Western Highlands Network:

- Buncombe, Henderson, Madison, Mitchell, Polk, Rutherford, Transylvania and Yancey Counties, effective January 1, 2012.
- Western Highlands merged with Smoky Mountain Center (now Vaya Health) on July 1, 2014.

Trillium Health Resources (formerly East Carolina Behavioral Health / ECBH):

- Beaufort, Bertie, Camden, Chowan, Craven, Currituck, Dare, Gates, Hertford, Hyde, Jones, Martin, Northampton, Pamlico, Pasquotank, Perquimans, Pitt, Tyrell, and Washington Counties, effective April 1, 2012.
- East Carolina Behavioral Health (ECBH) and Coastal Care merged on July 1, 2015 and became Trillium Health Resources.
- Brunswick, Carteret, New Hanover, Onslow and Pender Counties were added as a result.
- Nash County disengaged from Eastpointe and joined Trillium on July 1, 2017.
- Columbus County disengaged from Eastpointe and joined Trillium on July 1, 2018

Vaya Health (formerly Smoky Mountain Center)

- Alexander, Alleghany, Ashe, Avery, Caldwell, Cherokee, Clay, Graham, Haywood, Jackson, Macon, McDowell, Swain, Watauga, and Wilkes Counties effective July 1, 2012.
- Buncombe, Henderson, Madison, Mitchell, Polk, Rutherford, Transylvania and Yancey Counties were added, effective July 1, 2013, as part of the merger with Western Highlands Network.
- Smoky Mountain Center changed its name to Vaya Health on October 4, 2016.

#### Sandhills Center

- Anson, Harnett, Hoke, Lee, Montgomery, Moore, Randolph and Richmond Counties, effective December 1, 2012.
- Guilford County was added to Sandhills Center on April 1, 2013.

#### Eastpointe

- Bladen, Columbus, Duplin, Edgecombe, Greene, Lenoir, Nash, Robeson, Sampson, Scotland, Wayne, and Wilson Counties, effective January 1, 2013.
- Nash County disengaged from Eastpointe and joined Trillium on July 1, 2017.
- Columbus County disengaged from Eastpointe and joined Trillium on July 1, 2018

#### Partners Behavioral Health Management

- Burke, Catawba, Cleveland, Gaston, Iredell, Lincoln, Surry, and Yadkin Counties, effective February 1, 2013.

#### Alliance Behavioral Healthcare

- Durham, Cumberland, Johnston, and Wake Counties effective February 1, 2013.

#### CenterPoint Human Services

- Davie, Forsyth, Rockingham, and Stokes Counties, effective February 1, 2013.
- CenterPoint Human Services merged with Cardinal Innovations Healthcare Solutions on July 1, 2015.

#### MeckLINK

- Mecklenburg County, effective March 1, 2013.
- MeckLINK's contract with DMA was terminated April 1, 2014. At that time, Mecklenburg County joined the Cardinal Innovations Healthcare Solutions LME-MCO

#### CoastalCare

- Brunswick, New Hanover, Pender, Onslow, and Carteret Counties effective March 1, 2013.
- CoastalCare merged with East Carolina Behavioral Health (ECBH) on July 1, 2015 and became part of Trillium Health Resources.

The current regional configuration is as follows:

Alliance Behavioral Healthcare: Cumberland, Durham, Johnston and Wake Counties

Cardinal Innovations Healthcare Solutions: Alamance, Cabarrus, Caswell, Chatham, Davidson, Davie, Forsyth, Franklin, Granville, Halifax, Mecklenburg, Orange, Rockingham, Person, Rowan, Stanly, Stokes, Union, Vance and Warren Counties

Eastpointe: Bladen, Duplin, Edgecombe, Greene, Lenoir, Robeson, Sampson, Scotland, Wayne and Wilson Counties

Partners Behavioral Health Management: Burke, Catawba, Cleveland, Gaston, Iredell, Lincoln, Surry, Yadkin

Sandhills Center: Anson, Guilford, Harnett, Hoke, Lee, Montgomery, Moore and Randolph Counties

Trillium Health Resources: Beaufort, Bertie, Brunswick, Camden, Carteret, Chowan, Columbus, Craven, Currituck, Dare, Gates, Hertford, Hyde, Jones, Martin, Nash, New Hanover, Northampton, Onslow, Pamlico, Pasquotank, Pender, Perquimans, Pitt, Tyrrell and Washington Counties

Vaya Health: Alexander, Alleghany, Ashe, Avery, Buncombe, Caldwell, Cherokee, Clay, Graham, Haywood, Henderson, Jackson, Macon, Madison, McDowell, Mitchell, Polk, Rutherford, Swain, Transylvania, Watauga, Wilkes and Yancey Counties

Today, the 1915 (b) waiver operates concurrently with two 1915 (c) waivers: 1) NC Innovations Waiver, which serves individuals with intellectual and developmental disabilities; and 2) NCTBI Waiver pilot, which serves individuals with traumatic

brain injury, which became effective on May 1, 2018.

## Section A: Program Description

### Part I: Program Overview

#### A. Statutory Authority (1 of 3)

**1. Waiver Authority.** The State's waiver program is authorized under section 1915(b) of the Act, which permits the Secretary to waive provisions of section 1902 for certain purposes. Specifically, the State is relying upon authority provided in the following subsection(s) of the section 1915(b) of the Act (if more than one program authorized by this waiver, please list applicable programs below each relevant authority):

- a. ☒ **1915(b)(1)** - The State requires enrollees to obtain medical care through a primary care case management (PCCM) system or specialty physician services arrangements. This includes mandatory capitated programs.  
-- Specify Program Instance(s) applicable to this authority
- ☒ State of North C
- b. ☐ **1915(b)(2)** - A locality will act as a central broker (agent, facilitator, negotiator) in assisting eligible individuals in choosing among PCCMs or competing MCOs/PIHPs/PAHPs in order to provide enrollees with more information about the range of health care options open to them.  
-- Specify Program Instance(s) applicable to this authority
- ☐ State of North C
- c. ☒ **1915(b)(3)** - The State will share cost savings resulting from the use of more cost-effective medical care with enrollees by providing them with additional services. The savings must be expended for the benefit of the Medicaid beneficiary enrolled in the waiver. Note: this can only be requested in conjunction with section 1915(b)(1) or (b)(4) authority.  
-- Specify Program Instance(s) applicable to this authority
- ☒ State of North C
- d. ☒ **1915(b)(4)** - The State requires enrollees to obtain services only from specified providers who undertake to provide such services and meet reimbursement, quality, and utilization standards which are consistent with access, quality, and efficient and economic provision of covered care and services. The State assures it will comply with 42 CFR 431.55(f).  
-- Specify Program Instance(s) applicable to this authority

☒ State of North C

The 1915(b)(4) waiver applies to the following programs

☐ MCO

☒ PIHP

☐ PAHP

☐ PCCM (Note: please check this item if this waiver is for a PCCM program that limits who is eligible to be a primary care case manager. That is, a program that requires PCCMs to meet certain quality/utilization criteria beyond the minimum requirements required to be a fee-for-service Medicaid contracting provider.)

☐ FFS Selective Contracting program

Please describe:

## Section A: Program Description

### Part I: Program Overview

#### A. Statutory Authority (2 of 3)

**2. Sections Waived.** Relying upon the authority of the above section(s), the State requests a waiver of the following sections of 1902 of the Act (if this waiver authorizes multiple programs, please list program(s) separately under each applicable statute):

- a. ☐ **Section 1902(a)(1)** - Statewide--This section of the Act requires a Medicaid State plan to be in effect in all political subdivisions of the State. This waiver program is not available throughout the State.  
-- *Specify Program Instance(s) applicable to this statute*
- ☐ State of North C
- b. ☒ **Section 1902(a)(10)(B)** - Comparability of Services--This section of the Act requires all services for categorically needy individuals to be equal in amount, duration, and scope. This waiver program includes additional benefits such as case management and health education that will not be available to other Medicaid beneficiaries not enrolled in the waiver program.  
-- *Specify Program Instance(s) applicable to this statute*
- ☒ State of North C
- c. ☒ **Section 1902(a)(23)** - Freedom of Choice--This Section of the Act requires Medicaid State plans to permit all individuals eligible for Medicaid to obtain medical assistance from any qualified provider in the State. Under this program, free choice of providers is restricted. That is, beneficiaries enrolled in this program must receive certain services through an MCO, PIHP, PAHP, or PCCM.  
-- *Specify Program Instance(s) applicable to this statute*
- ☒ State of North C
- d. ☒ **Section 1902(a)(4)** - To permit the State to mandate beneficiaries into a single PIHP or PAHP, and restrict disenrollment from them. (If state seeks waivers of additional managed care provisions, please list here).

n/a

-- *Specify Program Instance(s) applicable to this statute*

☒ State of North C

- e. ☐ **Other Statutes and Relevant Regulations Waived** - Please list any additional section(s) of the Act the State requests to waive, and include an explanation of the request.

-- *Specify Program Instance(s) applicable to this statute*

☐ State of North C

## Section A: Program Description

### Part I: Program Overview

#### A. Statutory Authority (3 of 3)

**Additional Information.** Please enter any additional information not included in previous pages:

## Section A: Program Description

### Part I: Program Overview

#### B. Delivery Systems (1 of 3)

**1. Delivery Systems.** The State will be using the following systems to deliver services:

- a. ☐ **MCO:** Risk-comprehensive contracts are fully-capitated and require that the contractor be an MCO or HIO. Comprehensive means that the contractor is at risk for inpatient hospital services and any other mandatory State plan service in section 1905(a), or any three or more mandatory services in that section. References in this preprint to MCOs generally apply to these risk-comprehensive entities.
- b. ☒ **PIHP:** Prepaid Inpatient Health Plan means an entity that: (1) provides medical services to enrollees under contract with the State agency, and on the basis of prepaid capitation payments or other payment arrangements that do not use State Plan payment rates; (2) provides, arranges for, or otherwise has responsibility for the provision of any inpatient hospital or institutional services for its enrollees; and (3) does not have a comprehensive risk contract. Note: this includes MCOs paid on a non-risk basis.
- ☒ **The PIHP is paid on a risk basis**  
☐ **The PIHP is paid on a non-risk basis**
- c. ☐ **PAHP:** Prepaid Ambulatory Health Plan means an entity that: (1) provides medical services to enrollees under contract with the State agency, and on the basis of prepaid capitation payments, or other payment arrangements that do not use State Plan payment rates; (2) does not provide or arrange for, and is not otherwise responsible for the provision of any inpatient hospital or institutional services for its enrollees; and (3) does not have a comprehensive risk contract. This includes capitated PCCMs.
- ☐ **The PAHP is paid on a risk basis**  
☐ **The PAHP is paid on a non-risk basis**
- d. ☐ **PCCM:** A system under which a primary care case manager contracts with the State to furnish case management services. Reimbursement is on a fee-for-service basis. Note: a capitated PCCM is a PAHP.
- e. ☐ **Fee-for-service (FFS) selective contracting:** State contracts with specified providers who are willing to meet certain reimbursement, quality, and utilization standards.
- ☐ **the same as stipulated in the state plan**  
☐ **different than stipulated in the state plan**  
 Please describe:
- 
- f. ☐ **Other:** (Please provide a brief narrative description of the model.)
- 

**Section A: Program Description****Part I: Program Overview****B. Delivery Systems (2 of 3)**

- 2. Procurement.** The State selected the contractor in the following manner. Please complete for each type of managed care entity utilized (e.g. procurement for MCO; procurement for PIHP, etc):

☐ **Procurement for MCO**

- ☐ **Competitive** procurement process (e.g. Request for Proposal or Invitation for Bid that is formally advertised and

- targets a wide audience)
- ☐ **Open** cooperative procurement process (in which any qualifying contractor may participate)
  - ☐ **Sole source** procurement
  - ☐ **Other** (please describe)

☒ **Procurement for PIHP**

- ☐ **Competitive** procurement process (e.g. Request for Proposal or Invitation for Bid that is formally advertised and targets a wide audience)
- ☐ **Open** cooperative procurement process (in which any qualifying contractor may participate)
- ☒ **Sole source** procurement
- ☐ **Other** (please describe)

☐ **Procurement for PAHP**

- ☐ **Competitive** procurement process (e.g. Request for Proposal or Invitation for Bid that is formally advertised and targets a wide audience)
- ☐ **Open** cooperative procurement process (in which any qualifying contractor may participate)
- ☐ **Sole source** procurement
- ☐ **Other** (please describe)

☐ **Procurement for PCCM**

- ☐ **Competitive** procurement process (e.g. Request for Proposal or Invitation for Bid that is formally advertised and targets a wide audience)
- ☐ **Open** cooperative procurement process (in which any qualifying contractor may participate)
- ☐ **Sole source** procurement
- ☐ **Other** (please describe)

☐ **Procurement for FFS**

- ☐ **Competitive** procurement process (e.g. Request for Proposal or Invitation for Bid that is formally advertised and targets a wide audience)
- ☐ **Open** cooperative procurement process (in which any qualifying contractor may participate)
- ☐ **Sole source** procurement
- ☐ **Other** (please describe)

## Section A: Program Description

### Part I: Program Overview

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**B. Delivery Systems (3 of 3)**

**Additional Information.** Please enter any additional information not included in previous pages:

North Carolina has selected PIHP contractors through a sole source procurement process. This was initially requested during the 2009 waiver amendment and approved by CMS. North Carolina continues to contract with some of the PIHPs selected through the sole source procurement process. The total number of PIHP contractors has decreased since 2009 due to mergers, consolidations, etc. No new contractors have been added through any process.

The justification for sole source procurement as originally requested remains unchanged. North Carolina General Statute 122C designates local management entities (LMEs) as the "locus of coordination" for the provision of all publicly-funded mental health, intellectual/developmental disabilities, and substance use disorder (MH/IDD/SUD) services. The statute was amended in 2011 and 2012 through Session Laws 2011-264 and 2012-151 to require the delivery of these services through the LMEs under the authority of 1915(b)(c) waivers.

The goal of the State was to have a managed system in which the consumer can access all resource and funding streams for MH/IDD/SUD services through a single, local entity. This entity would bring together multiple policies, programs and payment resources, while reconciling various eligibility requirements, to achieve optimal outcomes for individuals in need of these services. This local entity could coordinate the specialized interventions, individualized supports and care management strategies required by individuals with MH/IDD/SUD. The coordination of services for this population requires a high level of collaboration and cooperation among multiple agencies, including public health, social services, housing, education, criminal justice, etc. Managing care for individuals with MH/IDD/SUD requires dedicated programs, transaction-specific facilities and a specialized workforce. There must be a strong, ongoing and collaborative relationship between the purchaser and the providers to achieve the necessary investment to support these services at the provider level.

Established local management entities (LMEs) are current the only organizations in North Carolina currently capable of managing the complex service and support needs of this specialty population. LMEs have been in operation for over 35 years and have had the ongoing role of protecting vulnerable populations and supporting full participation of individuals with MH/IDD/SUD in local communities. The is possible largely due to the longstanding relationships that LMEs have with social service systems in their communities. The infrastructure for managing these services and supports is already in place. Private managed care organizations in North Carolina have not traditionally had the necessary capacity, local experience and public behavioral health expertise. The financial risk and public accountability for public behavioral health services in North Carolina have always been held by the State and the LMEs.

Members of the EBCI Tribe receive services through Tribal providers. CIHA does have a contract with an LME-MCO (Vaya) for the delivery of the (b)(3) Peer Support service. The Cherokee Indian Hospital Authority (CHIA) contracts with Vaya Health to provide 1915(b)(3) Peer Support services to EBCI tribal members, providing culturally competent services to Medicaid members. EBCI tribal members who receive Medicaid have full access to services managed by the LME-MCO. They can choose from LME-MCO network providers and tribal providers.

Throughout the renewal period, the State will continue efforts to identify other entities that have developed the capacity to coordinate all public resources through multiple funding streams, address the unique characteristics of North Carolina's diverse local communities, and be found acceptable by the local Consumer and Family Advisory Committees. The State will evaluate identified entities for compelling justification to continue the sole source contract model in subsequent waiver renewals.

**Section A: Program Description****Part I: Program Overview****C. Choice of MCOs, PIHPs, PAHPs, and PCCMs (1 of 3)****1. Assurances.**

- ☒ The State assures CMS that it complies with section 1932(a)(3) of the Act and 42 CFR 438.52, which require that a State that mandates Medicaid beneficiaries to enroll in an MCO, PIHP, PAHP, or PCCM must give those beneficiaries a choice of at least two entities.
- ☒ The State seeks a waiver of section 1932(a)(3) of the Act, which requires States to offer a choice of more than one PIHP or PAHP per 42 CFR 438.52. Please describe how the State will ensure this lack of choice of PIHP or

PAHP is not detrimental to beneficiaries ability to access services.

PIHPs are local management entities (LMEs) coordinating publicly-funded MH/IDD/SUD services. NC General Statute 122C designates LMEs as the "locus of coordination" for the provision of all publicly-funded MH/IDD/SUD services in each LME's respective geographic catchment area. The State believes that the PIHPs are in a unique position to bring together the services and supports (formal and informal) and providers (professional and paraprofessional) that are needed to meet the complex needs of these populations. The LMEs have decades of experience locating and developing services for consumers with MH/IDD/SAS needs, and have built strong, collaborative working relationships with the providers of these services. These providers support this initiative and enrollees have at least as much choice of individual providers as they had in the non-managed care environment. By delivering, managing and paying for services through this one public entity with the appropriate experience, the State has streamlined and simplified the delivery system, better identified those in need of services and better assessed enrollee service needs.

Members of the EBCI Tribe can choose Tribal providers.

**2. Details.** The State will provide enrollees with the following choices (please replicate for each program in waiver):

*Program: " State of North Carolina NC MH/IDD/SAS Health Plan. "*

- ☐ Two or more MCOs
- ☐ Two or more primary care providers within one PCCM system.
- ☐ A PCCM or one or more MCOs
- ☐ Two or more PIHPs.
- ☐ Two or more PAHPs.
- ☐ Other:  
please describe

## Section A: Program Description

### Part I: Program Overview

#### C. Choice of MCOs, PIHPs, PAHPs, and PCCMs (2 of 3)

**3. Rural Exception.**

- ☐ The State seeks an exception for rural area residents under section 1932(a)(3)(B) of the Act and 42 CFR 438.52(b), and assures CMS that it will meet the requirements in that regulation, including choice of physicians or case managers, and ability to go out of network in specified circumstances. The State will use the rural exception in the following areas ( "rural area" must be defined as any area other than an "urban area" as defined in 42 CFR 412.62(f)(1)(ii)):

**4. 1915(b)(4) Selective Contracting.**

- ☐ Beneficiaries will be limited to a single provider in their service area  
Please define service area.

- ☒ Beneficiaries will be given a choice of providers in their service area

## Section A: Program Description

### Part I: Program Overview

#### C. Choice of MCOs, PIHPs, PAHPs, and PCCMs (3 of 3)

**Additional Information.** Please enter any additional information not included in previous pages:

2. Details. The State will provide enrollees with the following choices (please replicate for each program in waiver):

Enrollees have free choice of providers enrolled in the PIHP network for their geographic area and may change providers as often as desired. If an individual joins a PIHP and is already established with a provider who is not a member of that PIHP's network the PIHP will make every effort to arrange for the individual to continue with the same provider, if the individual so desires. The provider would be required to meet the same qualifications as network providers. In addition, if an enrollee needs a specialized service that is not available through the network, the PIHP will arrange for the service to be provided outside of the network. Enrollees are generally given the choice between two qualified providers. Exceptions are made for certain institutional or other highly specialized services that are usually available through one facility or agency within the geographic area.

Each year, LME-MCOs are required to submit a Network Adequacy and Accessibility Analysis and a Network Development Plan to the State. The LME-MCOs submissions follow a standard format and include a standardized form for requesting exceptions. The LME-MCOs are required to request exceptions for any services that do not meet the network accessibility requirements set by the state. Each exception request includes the following details:

1. The name of service requested.
2. The number of contracted providers with the LME-MCO.
3. The number of individuals in need of the service.
4. Reason(s) why the access and choice standard(s) cannot be met.
5. If an exception for the service has been requested previously, the date of the previous request.
6. How the LME-MCO will meet an individual's need for access to the service?
7. How with the LME-MCO offer a choice of providers to individuals needing the service?
8. What is the expected end date for the exception (not to exceed one year).

These documents are reviewed by cross functional teams from the Division of Health Benefits (NC Medicaid) and the Division of Mental Health, Developmental Disabilities and Substance Abuse Services. The cross functional team determines if an exception is appropriate and if the LME-MCO has a plan in place to ensure member access and choice. If it is determined that the exception is appropriate, and members have access to needed services, an exception is granted and communicated to the LME-MCO thru an approval letter. If the exception is not appropriate and/or the LME-MCO does not have an adequate plan to ensure that members have access to needed services, the request is denied and a corrective action plan is issued.

Tribal providers are not required to meet licensure or accreditation requirements.

## Section A: Program Description

### Part I: Program Overview

#### D. Geographic Areas Served by the Waiver (1 of 2)

**1. General.** Please indicate the area of the State where the waiver program will be implemented. (If the waiver authorizes more than one program, please list applicable programs below item(s) the State checks.

- **Statewide** -- all counties, zip codes, or regions of the State  
-- *Specify Program Instance(s) for Statewide*

☒ State of North C

- **Less than Statewide**  
-- *Specify Program Instance(s) for Less than Statewide*

☐ State of North C

**2. Details.** Regardless of whether item 1 or 2 is checked above, please list in the chart below the areas (i.e., cities, counties, and/or regions) and the name and type of entity or program (MCO, PIHP, PAHP, HIO, PCCM or other entity) with which the State will contract.

| City/County/Region | Type of Program (PCCM, MCO, PIHP, or PAHP) | Name of Entity (for MCO, PIHP, PAHP)      |
|--------------------|--|---|
| 20 Counties        | PIHP                                       | Cardinal Innovations Healthcare Solutions |
| 8 Counties         | PIHP                                       | Partners Behavioral Health Management     |
| 4 Counties         | PIHP                                       | Alliance Behavioral Healthcare            |
| 9 Counties         | PIHP                                       | Sandhills Center                          |
| 26 Counties        | PIHP                                       | Trillium Health Resources                 |
| 10 Counties        | PIHP                                       | Eastpointe                                |
| 23 Counties        | PIHP                                       | Vaya Health                               |

## Section A: Program Description

### Part I: Program Overview

#### D. Geographic Areas Served by the Waiver (2 of 2)

**Additional Information.** Please enter any additional information not included in previous pages:

Cardinal Innovations Healthcare Solutions Counties served: Alamance, Cabarrus, Caswell, Chatham, Davidson, Davie, Forsyth, Franklin, Granville, Halifax, Mecklenberg, Orange, Rockingham, Person, Rowan, Stanly, Stokes, Union, Vance and Warren

Partners Behavioral Health Management Counties served: Burke, Catawba, Cleveland, Gaston, Iredell, Lincoln, Surry and Yadkin

Alliance Behavioral Healthcare Counties served: Cumberland, Durham, Johnston and Wake

Sandhills Center Counties served: Anson, Guilford, Harnett, Hoke, Lee, Montgomery, Moore, Randolph, Richmond

Trillium Health Resources Counties served: Brunswick, Carteret, Columbus, Nash, New Hanover, Onslow, Pender, Beaufort, Bertie, Camden, Chowan, Craven, Currituck, Dare, Gates, Hertford, Hyde, Jones, Martin, Northampton, Pamlico, Pasquotank, Perquimans, Pitt, Tyrrell and Washington

Eastpointe: Bladen, Duplin, Edgecombe, Greene, Lenoir, Robeson, Sampson, Scotland, Wayne, Wilson

Vaya Health: Alexander, Alleghany, Ashe, Avery, Buncombe, Caldwell, Cherokee, Clay, Graham, Haywood, Henderson, Jackson, Macon, Madison, McDowell, Mitchell, Polk, Rutherford, Swain, Transylvania, Watauga, Wilkes and Yancey

## Section A: Program Description

### Part I: Program Overview

#### E. Populations Included in Waiver (1 of 3)

Please note that the eligibility categories of Included Populations and Excluded Populations below may be modified as needed to fit the States specific circumstances.

**1. Included Populations.** The following populations are included in the Waiver Program:

- ☒ **Section 1931 Children and Related Populations** are children including those eligible under Section 1931, poverty-level related groups and optional groups of older children.

☒ **Mandatory enrollment**

- ☐ **Voluntary enrollment**
- ☒ **Section 1931 Adults and Related Populations** are adults including those eligible under Section 1931, poverty-level pregnant women and optional group of caretaker relatives.
- ☒ **Mandatory enrollment**
- ☐ **Voluntary enrollment**
- ☒ **Blind/Disabled Adults and Related Populations** are beneficiaries, age 18 or older, who are eligible for Medicaid due to blindness or disability. Report Blind/Disabled Adults who are age 65 or older in this category, not in Aged.
- ☒ **Mandatory enrollment**
- ☐ **Voluntary enrollment**
- ☒ **Blind/Disabled Children and Related Populations** are beneficiaries, generally under age 18, who are eligible for Medicaid due to blindness or disability.
- ☒ **Mandatory enrollment**
- ☐ **Voluntary enrollment**
- ☒ **Aged and Related Populations** are those Medicaid beneficiaries who are age 65 or older and not members of the Blind/Disabled population or members of the Section 1931 Adult population.
- ☒ **Mandatory enrollment**
- ☐ **Voluntary enrollment**
- ☒ **Foster Care Children** are Medicaid beneficiaries who are receiving foster care or adoption assistance (Title IV-E), are in foster-care, or are otherwise in an out-of-home placement.
- ☒ **Mandatory enrollment**
- ☐ **Voluntary enrollment**
- ☐ **TITLE XXI SCHIP** is an optional group of targeted low-income children who are eligible to participate in Medicaid if the State decides to administer the State Childrens Health Insurance Program (SCHIP) through the Medicaid program.
- ☐ **Mandatory enrollment**
- ☐ **Voluntary enrollment**
- ☒ **Other** (Please define):

Optional categorically needy families and children and all medically needy individuals  
 Medicaid for Infants and Children  
 Special Assistance for the Disabled and Special Assistance for the Aged  
 Medicaid for Pregnant Women (MPW)

## Section A: Program Description

### Part I: Program Overview

#### E. Populations Included in Waiver (2 of 3)

- 2. Excluded Populations.** Within the groups identified above, there may be certain groups of individuals who are excluded from the Waiver Program. For example, the Aged population may be required to enroll into the program, but Dual Eligibles within that population may not be allowed to participate. In addition, Section 1931 Children may be able to enroll voluntarily in a managed care program, but Foster Care Children within that population may be excluded from that program. Please indicate if any of the following populations are excluded from participating in the Waiver Program:

- ☐ **Medicare Dual Eligible** --Individuals entitled to Medicare and eligible for some category of Medicaid benefits. (Section 1902(a)(10) and Section 1902(a)(10)(E))
- ☐ **Poverty Level Pregnant Women** -- Medicaid beneficiaries, who are eligible only while pregnant and for a short time after delivery. This population originally became eligible for Medicaid under the SOBRA legislation.
- ☐ **Other Insurance** --Medicaid beneficiaries who have other health insurance.
- ☐ **Reside in Nursing Facility or ICF/IID** --Medicaid beneficiaries who reside in Nursing Facilities (NF) or Intermediate Care Facilities for the Individuals with Intellectual Disabilities (ICF/IID).
- ☐ **Enrolled in Another Managed Care Program** --Medicaid beneficiaries who are enrolled in another Medicaid managed care program
- ☐ **Eligibility Less Than 3 Months** --Medicaid beneficiaries who would have less than three months of Medicaid eligibility remaining upon enrollment into the program.
- ☐ **Participate in HCBS Waiver** --Medicaid beneficiaries who participate in a Home and Community Based Waiver (HCBS, also referred to as a 1915(c) waiver).
- ☐ **American Indian/Alaskan Native** --Medicaid beneficiaries who are American Indians or Alaskan Natives and members of federally recognized tribes.
- ☐ **Special Needs Children (State Defined)** --Medicaid beneficiaries who are special needs children as defined by the State. Please provide this definition.

- ☒ **SCHIP Title XXI Children** Medicaid beneficiaries who receive services through the SCHIP program.
- ☒ **Retroactive Eligibility** Medicaid beneficiaries for the period of retroactive eligibility.
- ☒ **Other** (Please define):

Qualified Medicare beneficiary groups (MQ-B, E, and Q)  
 Children ages 0-3, except that all age groups may participate in the NC Innovations, HCBS waiver  
 Non-qualified aliens or qualified aliens during the 5 year ban

## Section A: Program Description

### Part I: Program Overview

#### E. Populations Included in Waiver (3 of 3)

**Additional Information.** Please enter any additional information not included in previous pages:

## Section A: Program Description

### Part I: Program Overview

#### F. Services (1 of 5)

List all services to be offered under the Waiver in Appendices D2.S. and D2.A of Section D, Cost-Effectiveness.

##### 1. Assurances.

- ☒ The State assures CMS that services under the Waiver Program will comply with the following federal requirements:
- Services will be available in the same amount, duration, and scope as they are under the State Plan per 42 CFR 438.210(a)(2).
  - Access to emergency services will be assured per section 1932(b)(2) of the Act and 42 CFR 438.114.
  - Access to family planning services will be assured per section 1905(a)(4) of the Act and 42 CFR 431.51(b)
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of more of the regulatory requirements listed above for PIHP or PAHP programs. Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any. (See note below for limitations on requirements that may be waived).
- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, PAHP, or PCCM contracts for compliance with the provisions of 42 CFR 438.210(a)(2), 438.114, and 431.51 (Coverage of Services, Emergency Services, and Family Planning) as applicable. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.
- ☐ This is a proposal for a 1915(b)(4) FFS Selective Contracting Program only and the managed care regulations do not apply. The State assures CMS that services will be available in the same amount, duration, and scope as they are under the State Plan.
- ☐ The state assures CMS that it complies with Title I of the Medicare Modernization Act of 2003, in so far as these requirements are applicable to this waiver.

Note: Section 1915(b) of the Act authorizes the Secretary to waive most requirements of section 1902 of the Act for the purposes listed in sections 1915(b)(1)-(4) of the Act. However, within section 1915(b) there are prohibitions on waiving the following subsections of section 1902 of the Act for any type of waiver program:

- Section 1902(s) -- adjustments in payment for inpatient hospital services furnished to infants under age 1, and to children under age 6 who receive inpatient hospital services at a Disproportionate Share Hospital (DSH) facility.
- Sections 1902(a)(15) and 1902(bb) prospective payment system for FQHC/RHC
- Section 1902(a)(10)(A) as it applies to 1905(a)(2)(C) comparability of FQHC benefits among Medicaid beneficiaries
- Section 1902(a)(4)(C) -- freedom of choice of family planning providers
- Sections 1915(b)(1) and (4) also stipulate that section 1915(b) waivers may not waive freedom of choice of emergency services providers.

## Section A: Program Description

### Part I: Program Overview

#### F. Services (2 of 5)

- 2. Emergency Services.** In accordance with sections 1915(b) and 1932(b) of the Act, and 42 CFR 431.55 and 438.114, enrollees in an MCO, PIHP, PAHP, or PCCM must have access to emergency services without prior authorization, even if the emergency services provider does not have a contract with the entity.

- ☐ The PAHP, PAHP, or FFS Selective Contracting program does not cover emergency services.

Emergency Services Category General Comments (optional):

**3. Family Planning Services.** In accordance with sections 1905(a)(4) and 1915(b) of the Act, and 42 CFR 431.51(b), prior authorization of, or requiring the use of network providers for family planning services is prohibited under the waiver program. Out-of-network family planning services are reimbursed in the following manner:

- ☐ The MCO/PIHP/PAHP will be required to reimburse out-of-network family planning services.
- ☐ The MCO/PIHP/PAHP will be required to pay for family planning services from network providers, and the State will pay for family planning services from out-of-network providers.
- ☐ The State will pay for all family planning services, whether provided by network or out-of-network providers.
- ☐ Other (please explain):

- ☒ Family planning services are not included under the waiver.

Family Planning Services Category General Comments (optional):

## Section A: Program Description

### Part I: Program Overview

#### F. Services (3 of 5)

**4. FQHC Services.** In accordance with section 2088.6 of the State Medicaid Manual, access to Federally Qualified Health Center (FQHC) services will be assured in the following manner:

- ☐ The program is **voluntary**, and the enrollee can disenroll at any time if he or she desires access to FQHC services. The MCO/PIHP/PAHP/PCCM is not required to provide FQHC services to the enrollee during the enrollment period.
- ☐ The program is **mandatory** and the enrollee is guaranteed a choice of at least one MCO/PIHP/PAHP/PCCM which has at least one FQHC as a participating provider. If the enrollee elects not to select a MCO/PIHP/PAHP/PCCM that gives him or her access to FQHC services, no FQHC services will be required to be furnished to the enrollee while the enrollee is enrolled with the MCO/PIHP/PAHP/PCCM he or she selected. Since reasonable access to FQHC services will be available under the waiver program, FQHC services outside the program will not be available. Please explain how the State will guarantee all enrollees will have a choice of at least one MCO/PIHP/PAHP/PCCM with a participating FQHC:

- ☒ The program is **mandatory** and the enrollee has the right to obtain FQHC services **outside** this waiver program



through the regular Medicaid Program.

FQHC Services Category General Comments (optional):

**5. EPSDT Requirements.**

- ☒ The managed care programs(s) will comply with the relevant requirements of sections 1905(a)(4)(b) (services), 1902(a)(43) (administrative requirements including informing, reporting, etc.), and 1905(r) (definition) of the Act related to Early, Periodic Screening, Diagnosis, and Treatment (EPSDT) program.

EPSDT Requirements Category General Comments (optional):

**Section A: Program Description**

**Part I: Program Overview**

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**F. Services (4 of 5)**

**6. 1915(b)(3) Services.**

- ☒ This waiver includes 1915(b)(3) expenditures. The services must be for medical or health-related care, or other services as described in 42 CFR Part 440, and are subject to CMS approval. Please describe below what these expenditures are for each waiver program that offers them. Include a description of the populations eligible, provider type, geographic availability, and reimbursement method.

1915(b)(3) Services Requirements Category General Comments:

The following applies to all the (b)(3) services:

- Services are available statewide
- Reimbursement is made through a separate capitation rate certified by the State's actuarial vendor. Total (b)(3) expenditures cannot exceed the resources available in the waiver
- Service providers must be enrolled in the PIHP network and meet all state and federal requirements, including, but not limited to, those found in 10 NCAC 27G.0204
- Cannot be provided to children ages 3-20th year who are receiving Medicaid MH/SUD residential treatment Cannot duplicate services currently being provided by educational institutions or Vocational Rehabilitation (VR)
- Medicaid services require a service order
- Medical necessity for services must be documented in a treatment plan (Person Centered Plan, Individual Support Plan, etc.) unless otherwise noted
- Additional staff training may be required by the PIHP based on individuals served.

**Respite:** Children and adults with I/DD as defined in GS 122C & children ages 3 – 20th year with SED; Services provided are consistent with the definitions for respite in the NC Innovations Waiver. Respite services should be documented in existing treatment plans; however, a treatment plan is not required for Respite services. Respite providers must meet the provider requirements indicated in the NC Innovations Waiver with applicable experience with the population served.

**Supported Employment:** Enrollees age 16 and older with I/DD as defined in GS 122C, SMI and/or SED. Services include initial job development, job training and support. Enrollees with I/DD follow the NC Innovations Waiver definition for Supported Employment and may also receive long term vocational support. Enrollees with SMI and/or SED receive services in accordance with Evidence Based Practices approved by the State, as described by the 2012 Department of Justice Settlement Agreement. Providers can be reimbursed per unit or based on milestones, as determined by the PIHP. Providers of services for enrollees with SMI and/or SED must meet the standards outline in the Evidence Based Practice approved by the State. Mental health components of Supported Employment, such as peer support and outpatient therapy, may be provided to enrollees receiving VR Services. Medicaid (b)(3) services cannot duplicate services provided by VR.

**Individual Support:** Adults age 18 and older with a diagnosis of SPMI. This service is a “hands on” service intended to teach and assist individuals in carrying out Instrumental Activities of Daily Living (IADLs) such as meal preparation, medication management, grocery shopping, money management, etc., so that they can live independently in the community. The intent of this service is that the need for the service would decrease over time as IADL skills develop and the enrollee becomes capable of performing activities more independently. Services are provided by paraprofessional staff with experience with the population.

**One-time Transitional Costs:** Adults with I/DD as defined in GS 122C and/or SPMI. This service provides funding for an individual to move from an institutional setting into his/her own private residence in the community or to divert an enrollee from entering an adult care home. Institutional settings include adult care homes, Institutions for Mental Diseases (IMDs), State Psychiatric Hospitals, ICF-IIDs, nursing facilities, PRTFs, or alternative family living arrangements. Funds are used to pay for necessary expenses to establish a basic living arrangement. These expenses are described in the “Additional Information” section. The total amount of funding available cannot exceed \$5,000 per enrollee. Funds can be used in conjunction with Transition Year Stability Funding (TYSF) and Money Follows the Person (MFP) start-up funds. Vendors, suppliers and commercial businesses can be paid directly by the PIHP, as appropriate. The PIHP may fund the expenses through a provider agency assisting the enrollee to move, as appropriate, and may allow providers to bill administrative expenses for time spent purchasing goods and/or arranging services.

One-time Transitional Costs may be used for the following:

1. Equipment, essential furnishings and household products;
2. Moving expenses;
3. Security deposits or other such payments required to obtain a lease;
4. Set-up fees or deposits for utility or service access (e.g. telephone, electricity, heating);
5. Environmental health and safety assurances, such as pest eradication, allergen control, one-time cleaning prior to occupancy;

**Peer Support:** This service applies adults age 18 and older with a diagnosis of SPMI. This service can be provided to enrollees who reside in an adult care home determined to be an Institution for Mental Disease (IMD), enrollees transitioning from adult care homes and State psychiatric facilities, or enrollees diverted from entry into adult care homes due to preadmission screening and diversion. This service is provided in conjunction with other clinical services and is provided by NC Certified Peer Support Specialists who meet all applicable state and federal requirements. Peer Support Specialists are supervised by a qualified professional and are not a relative of the enrollee. A maximum of 5 hours can be

provided per day by any one Peer Support Specialist. Services are individualized and recovery focused. Services are generally provided on an individual basis, but can be provided in a group of 5 or fewer enrollees.

**Physician Consultation:** Enrollees age 3 and older with a behavioral health diagnosis. The service is a consultative service that provides brief to extensive levels of consultation between a psychiatric provider or a psychiatric consultation team and a primary care provider, or a provider functioning in the capacity of a primary care provider, to ensure appropriate management of psychiatric conditions by the primary care provider. Consultation can be available remotely (in-state) or on-site with the primary care provider. The enrollee must be a patient of the primary care provider and cannot be an active patient of the psychiatric prescriber or another behavioral health and/or I/DD provider which has the capacity to address the primary care provider's consultation questions. This service allows for observation of the enrollee as a component of the consultation, either in-person or via video conferencing. All methods of communication must be HIPAA compliant. Consultation may take the form of email, telephone, videoconferencing, fax or face-to-face communication. This service is provided by a board certified/eligible psychiatrist with a current license in North Carolina. Consultative teams are led by a board certified/eligible psychiatrist with a current NC license. Other consultative team members may include one or more of the following operating within the appropriate scope of practice: A licensed clinician (LCAS, LMFT, LP, LPA, LPC, LCSW), a Master's level QP for linking to community resources, or an RN who meets QP status. Prior approval for this service is not required and a formal treatment plan, person centered plan and individual support plan is not required.

**Community Navigator:** Enrollees age 3 and older with I/DD. Services provided are consistent with the NC Innovations Waiver definition for Community Navigator.

**In-home Skill Building:** Enrollees age 3 and older with I/DD. This service is intended to provide short term (less than 6 months) intensive habilitative services to remediate one or more documented functional deficits, with a primary focus of positive behavior support. The service includes a comprehensive assessment to identify areas of functional deficit and coaching for family members on interventions. It is provided in the enrollee's home or community. Staff are professional level staff trained in curriculums that align with the CMS Core Competencies.

**Transitional Living Skills:** Children age 16 to 21 with SED who are transitioning to adulthood with at least one deficit in an instrumental activity of daily living (IADL). This service provides support in acquiring, retaining and improving self-help, socialization and adaptive skills necessary to be successful in employment, housing, education and community life and to reside successfully in the community. Activities are provided in partnership with youth to help the youth arrange for the services they need to become employed, access transportation, housing and continuing education. Services are individualized according to each youth's strengths, interests, skills, goals and are included on an individualized transition plan. This service may not be provided in a group. Housekeeping, homemaking, or basic services solely for the convenience of the child receiving the services are not covered. Staff are paraprofessional staff with at least 2 years of experience working with the population served and must complete training as identified by the PIHP.

**Intensive Recovery Support:** Pregnant women ages 18 or older, or women ages 18 or older with a minor child, who meet all of the following criteria: Has a substance use disorder diagnosis, has been discharged from substance use disorder treatment within the last 60 days, has functional impairment(s) related to the substance use disorder that interferes or limits one or more major life activities (employment, education, money management, accessing community resources, etc.) and needs support to maintain abstinence through the development of relapse prevention skills, coping skills, and crisis management. Services are provided by Qualified Professionals.

**NC Innovations Waiver Services:** Children ages 3-21 and adults who are functionally eligible, but not enrolled in the NC Innovations 1915(c) waiver program, who are exiting an Intermediate Care Facility for Individuals with Intellectual Disabilities. This service is consistent with the NC Innovations 1915(c) Waiver program. Providers must meet all NC Innovations Waiver requirements and be enrolled providers.

Tribal providers do not need to meet licensure or accreditation requirements.

## 7. Self-referrals.

- ☒ The State requires MCOs/PIHPs/PAHPs/PCCMs to allow enrollees to self-refer (i.e. access without prior authorization) under the following circumstances or to the following subset of services in the MCO/PIHP/PAHP/PCCM contract:

Self-referrals Requirements Category General Comments:

Basic benefits (outpatient) - 8 visits per year for adults, 16 visits per year for children  
 Medically managed detoxification (16 hours/episode)  
 Mobile crisis - 8 hours services allowed before being required to get prior authorization  
 Diagnostic assessments - two per year  
 Evaluation and management (E&M) visits by psychiatric providers - 22 visits per year without PA; no PA required for individuals with SPMI  
 Facility based crisis - prior authorization requests must be submitted within 2 business days of admission  
 Emergency Department services - prior authorization request must be submitted within 2 business days of admission

**8. Other.**

☐ Other (Please describe)

**Section A: Program Description****Part I: Program Overview****F. Services (5 of 5)**

**Additional Information.** Please enter any additional information not included in previous pages:

**Section A: Program Description****Part II: Access****A. Timely Access Standards (1 of 7)**

Each State must ensure that all services covered under the State plan are available and accessible to enrollees of the 1915(b) Waiver Program. Section 1915(b) of the Act prohibits restrictions on beneficiaries access to emergency services and family planning services.

**1. Assurances for MCO, PIHP, or PAHP programs**

- ☒ The State assures CMS that it complies with section 1932(c)(1)(A)(i) of the Act and 42 CFR 438.206 Availability of Services; in so far as these requirements are applicable.
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, or PAHP contracts for compliance with the provisions of section 1932(c)(1)(A)(i) of the Act and 42 CFR 438.206 Availability of Services. If this is an

initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

*If the 1915(b) Waiver Program does not include a PCCM component, please continue with Part II.B. Capacity Standards.*

## Section A: Program Description

### Part II: Access

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#### A. Timely Access Standards (2 of 7)

- 2. Details for PCCM program.** The State must assure that Waiver Program enrollees have reasonable access to services. Please note below the activities the State uses to assure timely access to services.

- a. ☐ **Availability Standards.** The States PCCM Program includes established maximum distance and/or travel time requirements, given beneficiary's normal means of transportation, for waiver enrollees access to the following providers. For each provider type checked, please describe the standard.

1. ☐ PCPs

*Please describe:*

2. ☐ Specialists

*Please describe:*

3. ☐ Ancillary providers

*Please describe:*

4. ☐ Dental

*Please describe:*

5. ☐ Hospitals

*Please describe:*

6. ☐ Mental Health

*Please describe:*

7. ☐ Pharmacies

*Please describe:*

8. ☐ Substance Abuse Treatment Providers

*Please describe:*

9. ☐ Other providers

*Please describe:*

## Section A: Program Description

### Part II: Access

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#### A. Timely Access Standards (3 of 7)

##### 2. Details for PCCM program. (Continued)

- b. ☐ **Appointment Scheduling** means the time before an enrollee can acquire an appointment with his or her provider for both urgent and routine visits. The States PCCM Program includes established standards for appointment scheduling for waiver enrollees access to the following providers.

1. ☐ PCPs

*Please describe:*

2. ☐ Specialists

*Please describe:*

3. ☐ Ancillary providers

*Please describe:*

4. ☐ Dental

*Please describe:*

5. ☐ Mental Health

*Please describe:*

6. ☐ Substance Abuse Treatment Providers

*Please describe:*

7. ☐ Urgent care

*Please describe:*

8. ☐ Other providers

*Please describe:*

## Section A: Program Description

### Part II: Access

#### A. Timely Access Standards (4 of 7)

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##### 2. Details for PCCM program. (Continued)

- c. ☐ **In-Office Waiting Times:** The States PCCM Program includes established standards for in-office waiting times. For each provider type checked, please describe the standard.

1. ☐ PCPs

*Please describe:*

2. ☐ Specialists

*Please describe:*

3. ☐ Ancillary providers

*Please describe:*

4. ☐ Dental

*Please describe:*

5. ☐ Mental Health

*Please describe:*

6. ☐ Substance Abuse Treatment Providers

*Please describe:*

7. ☐ Other providers

*Please describe:*

## Section A: Program Description

### Part II: Access

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#### A. Timely Access Standards (5 of 7)

##### 2. Details for PCCM program. (Continued)

- d. ☐ Other Access Standards



## Section A: Program Description

### Part II: Access

#### A. Timely Access Standards (6 of 7)

- 3. Details for 1915(b)(4)FFS selective contracting programs:** Please describe how the State assures timely access to the services covered under the selective contracting program.

n/a

## Section A: Program Description

### Part II: Access

#### A. Timely Access Standards (7 of 7)

**Additional Information.** Please enter any additional information not included in previous pages:

Any Indian Healthcare Provider (IHCP) in the geographic area served by the managed care entity will be entitled to participate in the entity's network in order to ensure timely access to Medicaid services for Indian enrollees entitled to receive IHS- funded services and Medicaid managed care services.

## Section A: Program Description

### Part II: Access

#### B. Capacity Standards (1 of 6)

##### 1. Assurances for MCO, PIHP, or PAHP programs

- ☒ The State assures CMS that it complies with section 1932(b)(5) of the Act and 42 CFR 438.207 Assurances of adequate capacity and services, in so far as these requirements are applicable.
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, or PAHP contracts for compliance with the provisions of section 1932(b)(5) and 42 CFR 438.207 Assurances of adequate capacity and services. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

*If the 1915(b) Waiver Program does not include a PCCM component, please continue with Part II, C. Coordination and Continuity of Care Standards.*

## Section A: Program Description

### Part II: Access

**B. Capacity Standards (2 of 6)**

- 2. Details for PCCM program.** The State must assure that Waiver Program enrollees have reasonable access to services. Please note below which of the strategies the State uses assure adequate provider capacity in the PCCM program.

- a. ☐ The State has set **enrollment limits** for each PCCM primary care provider.

*Please describe the enrollment limits and how each is determined:*

- b. ☐ The State ensures that there are adequate number of PCCM PCPs with **open panels**.

*Please describe the States standard:*

- c. ☐ The State ensures that there is an **adequate number** of PCCM PCPs under the waiver assure access to all services covered under the Waiver.

*Please describe the States standard for adequate PCP capacity:*

**Section A: Program Description****Part II: Access****B. Capacity Standards (3 of 6)**

- 2. Details for PCCM program.** (Continued)

- d. ☐ The State compares **numbers of providers** before and during the Waiver.

| Provider Type | # Before Waiver | # in Current Waiver | # Expected in Renewal |
|---------------|-----------------|---------------------|-----------------------|
|---------------|-----------------|---------------------|-----------------------|

*Please note any limitations to the data in the chart above:*

- e. ☐ The State ensures adequate **geographic distribution** of PCCMs.

*Please describe the States standard:*

**Section A: Program Description****Part II: Access****B. Capacity Standards (4 of 6)**

**2. Details for PCCM program.** (Continued)

- f. ☐ **PCP:Enrollee Ratio.** The State establishes standards for PCP to enrollee ratios.

| Area/(City/County/Region) | PCCM-to-Enrollee Ratio |
|---------------------------|------------------------|
|---------------------------|------------------------|

*Please note any changes that will occur due to the use of physician extenders.:*

- g. ☐ **Other capacity standards.**

*Please describe:*

**Section A: Program Description****Part II: Access****B. Capacity Standards (5 of 6)**

- 3. Details for 1915(b)(4)FFS selective contracting programs:** Please describe how the State assures provider capacity has not been negatively impacted by the selective contracting program. Also, please provide a detailed capacity analysis of the number of beds (by type, per facility) for facility programs, or vehicles (by type, per contractor) for non-emergency transportation programs, needed per location to assure sufficient capacity under the waiver program. This analysis should consider increased enrollment and/or utilization expected under the waiver.

n/a

**Section A: Program Description****Part II: Access****B. Capacity Standards (6 of 6)**

**Additional Information.** Please enter any additional information not included in previous pages:

n/a

**Section A: Program Description****Part II: Access****C. Coordination and Continuity of Care Standards (1 of 5)****1. Assurances for MCO, PIHP, or PAHP programs**

- ☒ The State assures CMS that it complies with section 1932(c)(1)(A)(i) of the Act and 42 CFR 438.206 Availability of Services; in so far as these requirements are applicable.
- ☐ The State seeks a waiver of a waiver of section 1902(a)(4) of the Act, to waive one or more of more of the regulatory requirements listed above for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, or PAHP contracts for compliance with the provisions of section 1932(c)(1)(A)(i) of the Act and 42 CFR 438.206 Availability of Services. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

## Section A: Program Description

### Part II: Access

#### C. Coordination and Continuity of Care Standards (2 of 5)

##### 2. Details on MCO/PIHP/PAHP enrollees with special health care needs.

The following items are required.

- a. ☐ The plan is a PIHP/PAHP, and the State has determined that based on the plans scope of services, and how the State has organized the delivery system, that the **PIHP/PAHP need not meet the requirements** for additional services for enrollees with special health care needs in 42 CFR 438.208.

*Please provide justification for this determination:*

- b. ☒ **Identification.** The State has a mechanism to identify persons with special health care needs to MCOs, PIHPs, and PAHPs, as those persons are defined by the State.

*Please describe:*

Each PIHP is required to identify clients who meet the following criteria:

- Adults with severe, persistent mental illness
- Children with severe emotional disturbances
- Individuals with intellectual/developmental disabilities who are functionally eligible for ICF-IID
- Female Temporary Assistance for Needy Families recipients with substance abuse dependency diagnoses
- Individuals with co-occurring diagnoses
- Individuals who are IV drug or opiate users
- Individuals transitioning to a home or community based residential setting in accordance with the NC DHHS Settlement Agreement with the US Department of Justice.

Children with complex needs as defined by the State Settlement Agreement with Disability Rights North Carolina.

The LME-MCO identifies individuals with special health care needs as described in the contract between the LME-MCO and the state. Treatment plans are person centered plans that include an assessment of individual's strengths, natural supports and treatment needs. Enrollees may contact specialists directly - they are not required to contact the LME-MCO for referral.

- c. ☒ **Assessment.** Each MCO/PIHP/PAHP will implement mechanisms, using appropriate health care professionals, to assess each enrollee identified by the State to identify any ongoing special conditions that require a course of treatment or regular care monitoring. Please describe:

*Please describe the enrollment limits and how each is determined:*

PIHP contracts require them to assess each Medicaid enrollee identified as having special health care needs in order to identify any ongoing special conditions of the enrollee that require a course of treatment or regular care monitoring. The assessment mechanisms must use appropriate healthcare professionals.

- d. ☒ **Treatment Plans.** For enrollees with special health care needs who need a course of treatment or regular care monitoring, the State requires the MCO/PIHP/PAHP to produce a treatment plan. If so, the treatment plan meets the following requirements:
1. ☒ Developed by enrollees primary care provider with enrollee participation, and in consultation with any specialists care for the enrollee.
  2. ☒ Approved by the MCO/PIHP/PAHP in a timely manner (if approval required by plan).
  3. ☒ In accord with any applicable State quality assurance and utilization review standards.

*Please describe:*

Treatment plans are person centered plans that include an assessment of individuals strengths, natural supports and treatment needs.

- e. ☒ **Direct access to specialists.** If treatment plan or regular care monitoring is in place, the MCO/PIHP/PAHP has a mechanism in place to allow enrollees to directly access specialists as appropriate for enrollees condition and identified needs.

*Please describe:*

Enrollees may contact specialists directly – they are not required to contact the LME-MCO for referral.

## Section A: Program Description

### Part II: Access

#### C. Coordination and Continuity of Care Standards (3 of 5)

3. **Details for PCCM program.** The State must assure that Waiver Program enrollees have reasonable access to services. Please note below which of the strategies the State uses assure adequate provider capacity in the PCCM program.

- a. ☐ Each enrollee selects or is assigned to a **primary care provider** appropriate to the enrollees needs.
- b. ☐ Each enrollee selects or is assigned to a designated **designated health care practitioner** who is primarily responsible for coordinating the enrollees overall health care.
- c. ☐ Each enrollee is receives **health education/promotion** information.

*Please explain:*

- d. ☐ Each provider maintains, for Medicaid enrollees, **health records** that meet the requirements established by the State, taking into account professional standards.
- e. ☐ There is appropriate and confidential **exchange of information** among providers.
- f. ☐ Enrollees receive information about specific health conditions that require **follow-up** and, if appropriate, are given training in self-care.
- g. ☐ Primary care case managers **address barriers** that hinder enrollee compliance with prescribed treatments or regimens, including the use of traditional and/or complementary medicine.

- h. ☐ **Additional case management** is provided.

*Please include how the referred services and the medical forms will be coordinated among the practitioners, and documented in the primary care case managers files.*

- i. ☐ **Referrals.**

*Please explain in detail the process for a patient referral. In the description, please include how the referred services and the medical forms will be coordinated among the practitioners, and documented in the primary care case managers files.*

## Section A: Program Description

### Part II: Access

#### C. Coordination and Continuity of Care Standards (4 of 5)

- 4. Details for 1915(b)(4) only programs:** If applicable, please describe how the State assures that continuity and coordination of care are not negatively impacted by the selective contracting program.

n/a

## Section A: Program Description

### Part II: Access

#### C. Coordination and Continuity of Care Standards (5 of 5)

**Additional Information.** Please enter any additional information not included in previous pages:

The EBCI Tribe is not required to use the standard treatment planning forms.

The LME-MCO will coordinate with the Tribal targeted case manager for individuals where appropriate.

Tribal members may receive services from tribal providers, from the LME-MCO, or from a combination of the two. If an enrollee receives services through both entities, the LME-MCO coordinates with the tribe to ensure that the individual is getting the services needed.

The EBCI Tribe uses a person-centered planning process consistent with the process used by the LME-MCO but uses forms and documentation consistent with the Cherokee Indian Health Authority (CIHA) and the Federal Indian Health Service (IHS) program.

## Section A: Program Description

### Part III: Quality

#### 1. Assurances for MCO or PIHP programs

- ☒ The State assures CMS that it complies with section 1932(c)(1)(A)(iii)-(iv) of the Act and 42 CFR 438.202, 438.204, 438.210, 438.214, 438.218, 438.224, 438.226, 438.228, 438.230, 438.236, 438.240, and 438.242 in so

far as these regulations are applicable.

- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, or PAHP contracts for compliance with the provisions of section 1932(c)(1)(A)(iii)-(iv) of the Act and 42 CFR 438.202, 438.204, 438.210, 438.214, 438.218, 438.224, 438.226, 438.228, 438.230, 438.236, 438.240, and 438.242. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.
- ☒ Section 1932(c)(1)(A)(iii)-(iv) of the Act and 42 CFR 438.202 requires that each State Medicaid agency that contracts with MCOs and PIHPs submit to CMS a written strategy for assessing and improving the quality of managed care services offered by all MCOs and PIHPs.

The State assures CMS that this **quality strategy** was initially submitted to the CMS Regional Office on:

05/13/13

(mm/dd/yy)

- ☒ The State assures CMS that it complies with section 1932(c)(2) of the Act and 42 CFR 438 Subpart E, to arrange for an annual, independent, **external quality review** of the outcomes and timeliness of, and access to the services delivered under each MCO/ PIHP contract. Note: EQR for PIHPs is required beginning March 2004.

*Please provide the information below (modify chart as necessary):*

| Program Type | Name of Organization                               | Activities Conducted |  |   |
|--------------|--|----------------------|--|---|
|              |  | EQR study            | Mandatory Activities   | Optional Activities   |
| MCO          |  |                      |  |   |
| PIHP         | The Carolinas Center for Medical Excellence (CCME) | X                    | Validation of performance measures; validation of performance improvement projects; on-site review | Encounter data validation / Information Systems Capability Assessment |

## Section A: Program Description

### Part III: Quality

#### 2. Assurances For PAHP program

- ☐ The State assures CMS that it complies with section 1932(c)(1)(A)(iii)-(iv) of the Act and 42 CFR 438.210, 438.214, 438.218, 438.224, 438.226, 438.228, 438.230 and 438.236, in so far as these regulations are applicable.
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☐ The CMS Regional Office has reviewed and approved the PAHP contracts for compliance with the provisions of section 1932(c) (1)(A)(iii)-(iv) of the Act and 42 CFR 438.210, 438.214, 438.218, 438.224, 438.226, 438.228, 438.230 and 438.236. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

## Section A: Program Description

### Part III: Quality

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**3. Details for PCCM program.** The State must assure that Waiver Program enrollees have access to medically necessary services of adequate quality. Please note below the strategies the State uses to assure quality of care in the PCCM program.

- a. ☐ The State has developed a set of overall quality **improvement guidelines** for its PCCM program.

*Please describe:*

## Section A: Program Description

### Part III: Quality

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**3. Details for PCCM program.** (Continued)

- b. ☐ **State Intervention:** If a problem is identified regarding the quality of services received, the State will intervene as indicated below.

1. ☐ Provide education and informal mailings to beneficiaries and PCCMs
2. ☐ Initiate telephone and/or mail inquiries and follow-up
3. ☐ Request PCCMs response to identified problems
4. ☐ Refer to program staff for further investigation
5. ☐ Send warning letters to PCCMs
6. ☐ Refer to States medical staff for investigation
7. ☐ Institute corrective action plans and follow-up
8. ☐ Change an enrollees PCCM
9. ☐ Institute a restriction on the types of enrollees
10. ☐ Further limit the number of assignments
11. ☐ Ban new assignments
12. ☐ Transfer some or all assignments to different PCCMs
13. ☐ Suspend or terminate PCCM agreement
14. ☐ Suspend or terminate as Medicaid providers
15. ☐ Other

*Please explain:*



## Section A: Program Description

### Part III: Quality

#### 3. Details for PCCM program. (Continued)

- c. ☐ **Selection and Retention of Providers:** This section provides the State the opportunity to describe any requirements, policies or procedures it has in place to allow for the review and documentation of qualifications and other relevant information pertaining to a provider who seeks a contract with the State or PCCM administrator as a PCCM. This section is required if the State has applied for a 1915(b)(4) waiver that will be applicable to the PCCM program.

Please check any processes or procedures listed below that the State uses in the process of selecting and retaining PCCMs. The State (please check all that apply):

1. ☐ Has a documented process for selection and retention of PCCMs (please submit a copy of that documentation).
2. ☐ Has an initial credentialing process for PCCMs that is based on a written application and site visits as appropriate, as well as primary source verification of licensure, disciplinary status, and eligibility for payment under Medicaid.
3. ☐ Has a recredentialing process for PCCMs that is accomplished within the time frame set by the State and through a process that updates information obtained through the following (check all that apply):
  - A. ☐ Initial credentialing
  - B. ☐ Performance measures, including those obtained through the following (check all that apply):
    - ☐ The utilization management system.
    - ☐ The complaint and appeals system.
    - ☐ Enrollee surveys.
    - ☐ Other.

*Please describe:*

4. ☐ Uses formal selection and retention criteria that do not discriminate against particular providers such as those who serve high risk populations or specialize in conditions that require costly treatment.
5. ☐ Has an initial and recredentialing process for PCCMs other than individual practitioners (e.g., rural health clinics, federally qualified health centers) to ensure that they are and remain in compliance with any Federal or State requirements (e.g., licensure).
6. ☐ Notifies licensing and/or disciplinary bodies or other appropriate authorities when suspensions or terminations of PCCMs take place because of quality deficiencies.
7. ☐ Other

*Please explain:*

## Section A: Program Description

### Part III: Quality

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#### 3. Details for PCCM program. (Continued)

##### d. Other quality standards (please describe):

## Section A: Program Description

### Part III: Quality

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#### 4. Details for 1915(b)(4) only programs: Please describe how the State assures quality in the services that are covered by the selective contracting program. Please describe the provider selection process, including the criteria used to select the providers under the waiver. These include quality and performance standards that the providers must meet. Please also describe how each criteria is weighted:

## Section A: Program Description

### Part IV: Program Operations

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#### A. Marketing (1 of 4)

##### 1. Assurances

- ☒ The State assures CMS that it complies with section 1932(d)(2) of the Act and 42 CFR 438.104 Marketing activities; in so far as these regulations are applicable.
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, PAHP, or PCCM contracts for compliance with the provisions of section 1932(d)(2) of the Act and 42 CFR 438.104 Marketing activities. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.
- ☐ This is a proposal for a 1915(b)(4) FFS Selective Contracting Program only and the managed care regulations do not apply.

## Section A: Program Description

### Part IV: Program Operations

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**A. Marketing (2 of 4)****2. Details****a. Scope of Marketing**

1. ☒ The State does not permit direct or indirect marketing by MCO/PIHP/PAHP/PCCM or selective contracting FFS providers.
2. ☐ The State permits indirect marketing by MCO/PIHP/PAHP/PCCM or selective contracting FFS providers (e.g., radio and TV advertising for the MCO/PIHP/PAHP or PCCM in general).

*Please list types of indirect marketing permitted:*

3. ☐ The State permits direct marketing by MCO/PIHP/PAHP/PCCM or selective contracting FFS providers (e.g., direct mail to Medicaid beneficiaries).

*Please list types of direct marketing permitted:*

**Section A: Program Description****Part IV: Program Operations****A. Marketing (3 of 4)****2. Details (Continued)**

**b. Description.** Please describe the States procedures regarding direct and indirect marketing by answering the following questions, if applicable.

1. ☐ The State prohibits or limits MCOs/PIHPs/PAHPs/PCCMs/selective contracting FFS providers from offering gifts or other incentives to potential enrollees.

*Please explain any limitation or prohibition and how the State monitors this:*

2. ☐ The State permits MCOs/PIHPs/PAHPs/PCCMs/selective contracting FFS providers to pay their marketing representatives based on the number of new Medicaid enrollees he/she recruited into the plan.

*Please explain how the State monitors marketing to ensure it is not coercive or fraudulent:*

3. ☒ The State requires MCO/PIHP/PAHP/PCCM/selective contracting FFS providers to translate marketing materials.

*Please list languages materials will be translated into. (If the State does not translate or require the*

*translation of marketing materials, please explain):*

Materials are translated into the prevalent languages for each PIHP geographic coverage area. Prevalent is defined as 5% or more of the population and includes Spanish.

The State has chosen these languages because (check any that apply):

- a. ☒ The languages comprise all prevalent languages in the service area.

*Please describe the methodology for determining prevalent languages:*

All written materials, including marketing materials, given to enrollees by the PIHP must be translated into the "prevalent" languages for the PIHP coverage area. Any language that is the primary language of 5% or more of the population is considered to be prevalent.

- b. ☐ The languages comprise all languages in the service area spoken by approximately  percent or more of the population.

- c. ☐ Other

*Please explain:*

## Section A: Program Description

### Part IV: Program Operations

#### A. Marketing (4 of 4)

**Additional Information.** Please enter any additional information not included in previous pages:

n/a

## Section A: Program Description

### Part IV: Program Operations

#### B. Information to Potential Enrollees and Enrollees (1 of 5)

##### 1. Assurances

- ☒ The State assures CMS that it complies with Federal Regulations found at section 1932(a)(5) of the Act and 42 CFR 438.10 Information requirements; in so far as these regulations are applicable.
- ☐ The State seeks a waiver of a waiver of section 1902(a)(4) of the Act, to waive one or more of more of the regulatory requirements listed above for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, PAHP, or PCCM contracts for

compliance with the provisions of section 1932(a)(5) of the Act and 42 CFR 438.10 Information requirements. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

- ☐ This is a proposal for a 1915(b)(4) FFS Selective Contracting Program only and the managed care regulations do not apply.

## Section A: Program Description

### Part IV: Program Operations

#### B. Information to Potential Enrollees and Enrollees (2 of 5)

##### 2. Details

##### a. Non-English Languages

1. ☒ Potential enrollee and enrollee materials will be translated into the prevalent non-English languages.

*Please list languages materials will be translated into. (If the State does not require written materials to be translated, please explain):*

Enrollee materials are translated into Spanish. PIHPs translate enrollee written materials based on the prevalent languages in their geographic areas.

If the State does not translate or require the translation of marketing materials, please explain:

The State defines prevalent non-English languages as: (check any that apply):

- a. ☐ The languages spoken by significant number of potential enrollees and enrollees.

*Please explain how the State defines significant.:*

- b. ☒ The languages spoken by approximately  percent or more of the potential enrollee/enrollee population.

- c. ☐ Other

*Please explain:*

2. ☒ Please describe how oral translation services are available to all potential enrollees and enrollees, regardless of language spoken.

Please see Part IV: Program Operations B: Information to Potential Enrollees and Enrollees, Additional Information

3. ☒ The State will have a mechanism in place to help enrollees and potential enrollees understand the managed care program.

*Please describe:*

Please see Part IV: Program Operations B: Information to Potential Enrollees and Enrollees, Additional Information

## Section A: Program Description

### Part IV: Program Operations

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#### B. Information to Potential Enrollees and Enrollees (3 of 5)

##### 2. Details (Continued)

###### b. Potential Enrollee Information

Information is distributed to potential enrollees by:

- ☐ State  
☐ Contractor

*Please specify:*

- ☒ There are no potential enrollees in this program. (Check this if State automatically enrolls beneficiaries into a single PIHP or PAHP.)

## Section A: Program Description

### Part IV: Program Operations

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#### B. Information to Potential Enrollees and Enrollees (4 of 5)

##### 2. Details (Continued)

###### c. Enrollee Information

The State has designated the following as responsible for providing required information to enrollees:

- ☐ the State  
☒ State contractor

*Please specify:*

The PIHPs provide written information on the Medicaid waiver program to all new enrollees within 14 days of enrollment. Written information must be available in the prevalent non-English languages found in the capitated catchment area. All new enrollee material must be approved by the State prior to its release and must include information specified in the PIHP contract.

- ☐ The MCO/PIHP/PAHP/PCCM/FFS selective contracting provider.

## Section A: Program Description

### Part IV: Program Operations

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#### B. Information to Potential Enrollees and Enrollees (5 of 5)

**Additional Information.** Please enter any additional information not included in previous pages:

The NC DHHS has implemented a language access policy to ensure that people with LEP have equal access to benefits and services for which they may qualify from entities receiving federal financial assistance. The policy applies to the NC DHHS, all divisions/institutions within DHHS and all programs and services administered, established or funded by DHHS, including subcontractors, vendors and subrecipients.

The policy requires all divisions and institutions with DHHS and all local management entities, including the PIHPs, to maintain a Language Access Plan. The Plan must include a system for assessing the language needs of LEP populations and individual LEP applicants/recipients; securing resources for language services; providing language access services; assessing and providing staff training; and monitoring the quality and effectiveness of language access services. PIHPs must ensure that effective bilingual/interpretive services are provided to serve the needs of the LEP population at no cost to the enrollee. PIHPs must also provide written materials in languages other than English where a significant number or percentage of the population eligible to be served or likely to be directly affected by the program needs services or information in a language other than English.

## Section A: Program Description

### Part IV: Program Operations

#### C. Enrollment and Disenrollment (1 of 6)

##### 1. Assurances

- ☐ The State assures CMS that it complies with section 1932(a)(4) of the Act and 42 CFR 438.56 Disenrollment; in so far as these regulations are applicable.
- ☒ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP or PAHP programs. (Please check this item if the State has requested a waiver of the choice of plan requirements in section A.I.C.)

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

The State seeks a waiver of section 1902(a)(4) of the Act, waiving enrollee disenrollment. There is no other MH/IDD/SUD system available in North Carolina to deliver these services to Medicaid enrollees. Additionally, the State seeks a waiver of section 1932(a)(3) of the Act, which requires States to offer a choice of more than one PIHP per 42 CFR 438.52 as identified in section A.I.C of the waiver application. Enrollees are given choice of providers.

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, PAHP, or PCCM contracts for compliance with the provisions of section 1932(a)(4) of the Act and 42 CFR 438.56 Disenrollment requirements. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.
- ☐ This is a proposal for a 1915(b)(4) FFS Selective Contracting Program only and the managed care regulations do not apply.

## Section A: Program Description

### Part IV: Program Operations

#### C. Enrollment and Disenrollment (2 of 6)

##### 2. Details

Please describe the States enrollment process for MCOs/PIHPs/PAHP/PCCMs and FFS selective contracting provider by checking the applicable items below.

##### a. Outreach

- ☒ The State conducts outreach to inform potential enrollees, providers, and other interested parties of the managed care program.

*Please describe the outreach process, and specify any special efforts made to reach and provide information to special populations included in the waiver program:*

The State notifies all potential PIHP enrollees through written communication. The State notifies providers prior to program implementation and periodically thereafter through Medicaid Bulletins. Individuals with questions on eligibility and enrollment are directed to a toll-free number for the PIHP member services unit. The unit provides information and referral for benefits assessment as needed.

## Section A: Program Description

### Part IV: Program Operations

#### C. Enrollment and Disenrollment (3 of 6)

##### 2. Details (Continued)

##### b. Administration of Enrollment Process

- ☒ State staff conducts the enrollment process.
- ☐ The State contracts with an independent contractor(s) (i.e., enrollment broker) to conduct the enrollment process and related activities.
- ☐ The State assures CMS the enrollment broker contract meets the independence and freedom from conflict of interest requirements in section 1903(b) of the Act and 42 CFR 438.810.

Broker name:

Please list the functions that the contractor will perform:

- ☐ choice counseling
- ☐ enrollment
- ☐ other

*Please describe:*

- ☐ State allows MCO/PIHP/PAHP or PCCM to enroll beneficiaries.

*Please describe the process:*

## Section A: Program Description

### Part IV: Program Operations

#### C. Enrollment and Disenrollment (4 of 6)

##### 2. Details (Continued)

**c. Enrollment** . The State has indicated which populations are mandatorily enrolled and which may enroll on a voluntary basis in Section A.I.E.

- ☐ This is a **new** program.



Please describe the **implementation schedule** (e.g. implemented statewide all at once; phased in by area; phased in by population, etc.):

- ☐ This is an **existing program** that will be expanded during the renewal period.

*Please describe:* Please describe the **implementation schedule** (e.g. new population implemented statewide all at once; phased in by area; phased in by population, etc.):

- ☐ If a potential enrollee **does not select** an MCO/PIHP/PAHP or PCCM within the given time frame, the potential enrollee will be **auto-assigned** or default assigned to a plan.

- i. ☐ Potential enrollees will have  ☐ day(s) / ☐ month(s) to choose a plan.
- ii. ☐ There is an auto-assignment process or algorithm.

*In the description please indicate the factors considered and whether or not the auto-assignment process assigns persons with special health care needs to an MCO/PIHP/PAHP/PCCM who is their current provider or who is capable of serving their particular needs:*

- ☒ The State automatically enrolls beneficiaries.
- ☐ on a mandatory basis into a single MCO, PIHP, or PAHP in a rural area (please also check item A.I.C.3).
- ☒ on a mandatory basis into a single PIHP or PAHP for which it has requested a waiver of the requirement of choice of plans (please also check item A.I.C.1).
- ☐ on a voluntary basis into a single MCO, PIHP, or PAHP. The State must first offer the beneficiary a choice. If the beneficiary does not choose, the State may enroll the beneficiary as long as the beneficiary can opt out at any time without cause.

*Please specify geographic areas where this occurs:*

- ☐ The State provides **guaranteed eligibility** of  months (maximum of 6 months permitted) for MCO/PCCM enrollees under the State plan.
- ☐ The State allows otherwise mandated beneficiaries to request **exemption** from enrollment in an MCO/PIHP/PAHP/PCCM.

*Please describe the circumstances under which a beneficiary would be eligible for exemption from enrollment. In addition, please describe the exemption process:*

- ☒ The State **automatically re-enrolls** a beneficiary with the same PCCM or MCO/PIHP/PAHP if there is a loss of Medicaid eligibility of 2 months or less.

## Section A: Program Description

### Part IV: Program Operations

#### C. Enrollment and Disenrollment (5 of 6)

##### 2. Details (Continued)

##### d. Disenrollment

- ☐ The State allows enrollees to **disenroll** from/transfer between MCOs/PIHPs/PAHPs and PCCMs. Regardless of whether plan or State makes the determination, determination must be made no later than the first day of the second month following the month in which the enrollee or plan files the request. If determination is not made within this time frame, the request is deemed approved.
- i. ☐ Enrollee submits request to State.
  - ii. ☐ Enrollee submits request to MCO/PIHP/PAHP/PCCM. The entity may approve the request, or refer it to the State. The entity may not disapprove the request.
  - iii. ☐ Enrollee must seek redress through MCO/PIHP/PAHP/PCCM grievance procedure before determination will be made on disenrollment request.
- ☒ The State **does not permit disenrollment** from a single PIHP/PAHP (authority under 1902 (a)(4) authority must be requested), or from an MCO, PIHP, or PAHP in a rural area.
- ☐ The State has a **lock-in** period (i.e. requires continuous enrollment with MCO/PIHP/PAHP/PCCM) of  months (up to 12 months permitted). If so, the State assures it meets the requirements of 42 CFR 438.56(c).

*Please describe the good cause reasons for which an enrollee may request disenrollment during the lock-in period (in addition to required good cause reasons of poor quality of care, lack of access to covered services, and lack of access to providers experienced in dealing with enrollees health care needs):*

- ☐ The State does not have a **lock-in**, and enrollees in MCOs/PIHPs/PAHPs and PCCMs are allowed to terminate or change their enrollment without cause at any time. The disenrollment/transfer is effective no later than the first day of the second month following the request.
- ☐ The State permits **MCOs/PIHPs/PAHPs and PCCMs to request disenrollment** of enrollees.
- i. ☐ MCO/PIHP/PAHP and PCCM can request reassignment of an enrollee.

*Please describe the reasons for which enrollees can request reassignment*

- ii. ☐ The State reviews and approves all MCO/PIHP/PAHP/PCCM-initiated requests for enrollee transfers or disenrollments.
- iii. ☐ If the reassignment is approved, the State notifies the enrollee in a direct and timely manner of the desire of the MCO/PIHP/PAHP/PCCM to remove the enrollee from its membership or from the PCCMs caseload.
- iv. ☐ The enrollee remains an enrollee of the MCO/PIHP/PAHP/PCCM until another MCO/PIHP/PAHP/PCCM is chosen or assigned.

**Section A: Program Description****Part IV: Program Operations****C. Enrollment and Disenrollment (6 of 6)**

**Additional Information.** Please enter any additional information not included in previous pages:

n/a

**Section A: Program Description****Part IV: Program Operations****D. Enrollee Rights (1 of 2)****1. Assurances**

- ☒ The State assures CMS that it complies with section 1932(a)(5)(B)(ii) of the Act and 42 CFR 438 Subpart C Enrollee Rights and Protections.
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO, PIHP, PAHP, or PCCM contracts for compliance with the provisions of section 1932(a)(5)(B)(ii) of the Act and 42 CFR Subpart C Enrollee Rights and Protections. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.
- ☐ This is a proposal for a 1915(b)(4) FFS Selective Contracting Program only and the managed care regulations do not apply.
- ☒ The State assures CMS it will satisfy all HIPAA Privacy standards as contained in the HIPAA rules found at 45 CFR Parts 160 and 164.

**Section A: Program Description****Part IV: Program Operations****D. Enrollee Rights (2 of 2)**

**Additional Information.** Please enter any additional information not included in previous pages:

n/a

**Section A: Program Description****Part IV: Program Operations****E. Grievance System (1 of 5)**

**1. Assurances for All Programs** States, MCOs, PIHPs, PAHPs, and States in PCCM and FFS selective contracting programs are required to provide Medicaid enrollees with access to the State fair hearing process as required under 42 CFR 431 Subpart E, including:

- a. informing Medicaid enrollees about their fair hearing rights in a manner that assures notice at the time of an action,
  - b. ensuring that enrollees may request continuation of benefits during a course of treatment during an appeal or reinstatement of services if State takes action without the advance notice and as required in accordance with State Policy consistent with fair hearings. The State must also inform enrollees of the procedures by which benefits can be continued for reinstated, and
  - c. other requirements for fair hearings found in 42 CFR 431, Subpart E.
- ☒ The State assures CMS that it complies with section 1932(a)(4) of the Act and 42 CFR 438.56 Disenrollment; in so far as these regulations are applicable.

## Section A: Program Description

### Part IV: Program Operations

#### E. Grievance System (2 of 5)

**2. Assurances For MCO or PIHP programs.** MCOs/PIHPs are required to have an internal grievance system that allows an enrollee or a provider on behalf of an enrollee to challenge the denial of coverage of, or payment for services as required by section 1932(b)(4) of the Act and 42 CFR 438 Subpart H.

- ☒ The State assures CMS that it complies with section 1932(b)(4) of the Act and 42 CFR 438 Subpart F Grievance System, in so far as these regulations are applicable.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

n/a

- ☒ The CMS Regional Office has reviewed and approved the MCO or PIHP contracts for compliance with the provisions of section 1932(b)(4) of the Act and 42 CFR 438 Subpart F Grievance System. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

## Section A: Program Description

### Part IV: Program Operations

#### E. Grievance System (3 of 5)

**3. Details for MCO or PIHP programs**

##### a. Direct Access to Fair Hearing

- ☒ The State **requires** enrollees to **exhaust** the MCO or PIHP grievance and appeal process before enrollees may request a state fair hearing.
- ☐ The State **does not require** enrollees to **exhaust** the MCO or PIHP grievance and appeal process before enrollees may request a state fair hearing.

##### b. Timeframes

- ☒ The States timeframe within which an enrollee, or provider on behalf of an enrollee, must file an **appeal** is  days (between 20 and 90).

☒ The States timeframe within which an enrollee must file a **grievance** is  days.

**c. Special Needs**

☐ The State has special processes in place for persons with special needs.

*Please describe:*

**Section A: Program Description**

**Part IV: Program Operations**

**E. Grievance System (4 of 5)**

**4. Optional grievance systems for PCCM and PAHP programs.** States, at their option, may operate a PCCM and/or PAHP grievance procedure (distinct from the fair hearing process) administered by the State agency or the PCCM and/or PAHP that provides for prompt resolution of issues. These grievance procedures are strictly voluntary and may not interfere with a PCCM, or PAHP enrollees freedom to make a request for a fair hearing or a PCCM or PAHP enrollees direct access to a fair hearing in instances involving terminations, reductions, and suspensions of already authorized Medicaid covered services.

☐ The State has a grievance procedure for its ☐ PCCM and/or ☐ PAHP program characterized by the following (please check any of the following optional procedures that apply to the optional PCCM/PAHP grievance procedure):  
The grievance procedures are operated by:

- ☐ the State  
☐ the States contractor.

Please identify:

- ☐ the PCCM  
☐ the PAHP

☐ Requests for review can be made in the PCCM and/or PAHP grievance system (e.g. grievance, appeals):

*Please describe:*

☐ Has a committee or staff who review and resolve requests for review.

*Please describe if the State has any specific committee or staff composition or if this is a fiscal agent, enrollment broker, or PCCM administrator function:*

☐ Specifies a time frame from the date of action for the enrollee to file a request for review.

*Please specify the time frame for each type of request for review:*

- ☐ Has time frames for resolving requests for review.

*Specify the time period set for each type of request for review:*

- ☐ Establishes and maintains an expedited review process.

*Please explain the reasons for the process and specify the time frame set by the State for this process:*

- ☐ Permits enrollees to appear before State PCCM/PAHP personnel responsible for resolving the request for review.
- ☐ Notifies the enrollee in writing of the decision and any further opportunities for additional review, as well as the procedures available to challenge the decision.
- ☐ Other.

*Please explain:*

## Section A: Program Description

### Part IV: Program Operations

#### E. Grievance System (5 of 5)

**Additional Information.** Please enter any additional information not included in previous pages:

n/a

## Section A: Program Description

### Part IV: Program Operations

#### F. Program Integrity (1 of 3)

##### 1. Assurances

- ☒ The State assures CMS that it complies with section 1932(d)(1) of the Act and 42 CFR 438.610 Prohibited Affiliations with Individuals Barred by Federal Agencies. The State assures that it prohibits an MCO, PCCM, PIHP, or PAHP from knowingly having a relationship listed below with:
1. An individual who is debarred, suspended, or otherwise excluded from participating in procurement activities under the Federal Acquisition Regulation or from participating in nonprocurement activities under regulations issued under Executive Order No. 12549 or under guidelines implementing Executive Order No. 12549, or
  2. An individual who is an affiliate, as defined in the Federal Acquisition Regulation, of a person described above.

The prohibited relationships are:

1. A director, officer, or partner of the MCO, PCCM, PIHP, or PAHP;
2. A person with beneficial ownership of five percent or more of the MCOs, PCCMs, PIHPs, or PAHPs equity;
3. A person with an employment, consulting or other arrangement with the MCO, PCCM, PIHP, or PAHP for the provision of items and services that are significant and material to the MCOs, PCCMs, PIHPs, or PAHPs obligations under its contract with the State.

- ☒ The State assures that it complies with section 1902(p)(2) and 42 CFR 431.55, which require section 1915(b) waiver programs to exclude entities that:

1. Could be excluded under section 1128(b)(8) of the Act as being controlled by a sanctioned individual;
2. Has a substantial contractual relationship (direct or indirect) with an individual convicted of certain crimes described in section 1128(b)(8)(B) of the Act;
3. Employs or contracts directly or indirectly with an individual or entity that is
  - a. precluded from furnishing health care, utilization review, medical social services, or administrative services pursuant to section 1128 or 1128A of the Act, or
  - b. could be excluded under 1128(b)(8) as being controlled by a sanctioned individual.

## Section A: Program Description

### Part IV: Program Operations

#### F. Program Integrity (2 of 3)

##### 2. Assurances For MCO or PIHP programs

- ☒ The State assures CMS that it complies with section 1932(d)(1) of the Act and 42 CFR 438.608 Program Integrity Requirements, in so far as these regulations are applicable.
- ☒ State payments to an MCO or PIHP are based on data submitted by the MCO or PIHP. If so, the State assures CMS that it is in compliance with 42 CFR 438.604 Data that must be Certified, and 42 CFR 438.606 Source, Content, Timing of Certification.
- ☐ The State seeks a waiver of section 1902(a)(4) of the Act, to waive one or more of the regulatory requirements listed for PIHP or PAHP programs.

*Please identify each regulatory requirement for which a waiver is requested, the managed care program(s) to which the waiver will apply, and what the State proposes as an alternative requirement, if any:*

- ☒ The CMS Regional Office has reviewed and approved the MCO or PIHP contracts for compliance with the provisions of section 1932(d)(1) of the Act and 42 CFR 438.604 Data that must be Certified; 438.606 Source, Content, Timing of Certification; and 438.608 Program Integrity Requirements. If this is an initial waiver, the State assures that contracts that comply with these provisions will be submitted to the CMS Regional Office for approval prior to enrollment of beneficiaries in the MCO, PIHP, PAHP, or PCCM.

## Section A: Program Description

### Part IV: Program Operations

#### F. Program Integrity (3 of 3)

**Additional Information.** Please enter any additional information not included in previous pages:

n/a

## Section B: Monitoring Plan

**Part I: Summary Chart of Monitoring Activities****Summary of Monitoring Activities (1 of 3)**

The charts in this section summarize the activities used to monitor major areas of the waiver program. The purpose is to provide a big picture of the monitoring activities, and that the State has at least one activity in place to monitor each of the areas of the waiver that must be monitored.

Please note:

- **MCO, PIHP, and PAHP** programs:
  - There must be at least one checkmark in each column.
- **PCCM and FFS selective contracting** programs:
  - There must be at least one checkmark in each column under Evaluation of Program Impact.
  - There must be at least one check mark in one of the three columns under Evaluation of Access.
  - There must be at least one check mark in one of the three columns under Evaluation of Quality.

**Summary of Monitoring Activities: Evaluation of Program Impact**

| Evaluation of Program Impact      |   |   |   |  |  |  |
|-----------------------------------|---|---|---|--|--|--|
| Monitoring Activity               | Choice  | Marketing   | Enroll Disenroll  | Program Integrity  | Information to Beneficiaries   | Grievance  |
| Accreditation for Non-duplication | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Accreditation for Participation   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Consumer Self-Report data         | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Data Analysis (non-claims)        | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Enrollee Hotlines                 | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Focused Studies                   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP  | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP  | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP  |



| Evaluation of Program Impact                              |   |  |   |  |  |  |
|---|---|--|---|--|--|--|
| Monitoring Activity                                       | Choice  | Marketing  | Enroll Disenroll  | Program Integrity  | Information to Beneficiaries   | Grievance  |
|   | <input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS  | <input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS   | <input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS  | <input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS   | <input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS   | <input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS   |
| <b>Geographic mapping</b>                                 | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Independent Assessment</b>                             | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Measure any Disparities by Racial or Ethnic Groups</b> | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Network Adequacy Assurance by Plan</b>                 | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Ombudsman</b>  | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>On-Site Review</b>                                     | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| <b>Performance Improvement Projects</b>                   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Performance Measures</b>                               | <input type="checkbox"/> MCO  | <input type="checkbox"/> MCO   | <input type="checkbox"/> MCO  | <input type="checkbox"/> MCO   | <input type="checkbox"/> MCO   | <input type="checkbox"/> MCO   |

| Evaluation of Program Impact             |   |   |   |  |  |  |
|--|---|---|---|--|--|--|
| Monitoring Activity                      | Choice  | Marketing   | Enroll Disenroll  | Program Integrity  | Information to Beneficiaries   | Grievance  |
|  | <input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS                                 | <input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS                                 | <input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS                                 | <input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS  | <input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS  | <input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS                                 |
| Periodic Comparison of # of Providers    | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Profile Utilization by Provider Caseload | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Provider Self-Report Data                | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Test 24/7 PCP Availability               | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Utilization Review                       | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Other                                    | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |

## Section B: Monitoring Plan

### Part I: Summary Chart of Monitoring Activities

#### Summary of Monitoring Activities (2 of 3)

The charts in this section summarize the activities used to monitor major areas of the waiver program. The purpose is to

provide a big picture of the monitoring activities, and that the State has at least one activity in place to monitor each of the areas of the waiver that must be monitored.

Please note:

- **MCO, PIHP, and PAHP** programs:
  - There must be at least one checkmark in each column.
- **PCCM and FFS selective contracting** programs:
  - There must be at least one checkmark in each column under Evaluation of Program Impact.
  - There must be at least one check mark in one of the three columns under Evaluation of Access.
  - There must be at least one check mark in one of the three columns under Evaluation of Quality.

#### Summary of Monitoring Activities: Evaluation of Access

| Evaluation of Access              |  |  |  |
|-----------------------------------|--|--|--|
| Monitoring Activity               | Timely Access  | PCP / Specialist Capacity  | Coordination / Continuity  |
| Accreditation for Non-duplication | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Accreditation for Participation   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Consumer Self-Report data         | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Data Analysis (non-claims)        | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Enrollee Hotlines                 | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Focused Studies                   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Geographic mapping                | <input type="checkbox"/> MCO   | <input type="checkbox"/> MCO   | <input type="checkbox"/> MCO   |

| Evaluation of Access                                      |  |  |  |
|---|--|--|--|
| Monitoring Activity                                       | Timely Access  | PCP / Specialist Capacity  | Coordination / Continuity  |
|   | <input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS                                 | <input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS                                 | <input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS  |
| <b>Independent Assessment</b>                             | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Measure any Disparities by Racial or Ethnic Groups</b> | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Network Adequacy Assurance by Plan</b>                 | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>Ombudsman</b>  | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| <b>On-Site Review</b>                                     | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| <b>Performance Improvement Projects</b>                   | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| <b>Performance Measures</b>                               | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |

| Evaluation of Access                     |  |  |   |
|--|--|--|---|
| Monitoring Activity                      | Timely Access  | PCP / Specialist Capacity  | Coordination / Continuity   |
| Periodic Comparison of # of Providers    | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Profile Utilization by Provider Caseload | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Provider Self-Report Data                | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Test 24/7 PCP Availability               | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Utilization Review                       | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Other                                    | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |

## Section B: Monitoring Plan

### Part I: Summary Chart of Monitoring Activities

#### Summary of Monitoring Activities (3 of 3)

The charts in this section summarize the activities used to monitor major areas of the waiver program. The purpose is to provide a big picture of the monitoring activities, and that the State has at least one activity in place to monitor each of the areas of the waiver that must be monitored.

Please note:

- MCO, PIHP, and PAHP programs:
  - There must be at least one checkmark in each column.

- **PCCM and FFS selective contracting** programs:
  - There must be at least one checkmark in each column under Evaluation of Program Impact.
  - There must be at least one check mark in one of the three columns under Evaluation of Access.
  - There must be at least one check mark in one of the three columns under Evaluation of Quality.

**Summary of Monitoring Activities: Evaluation of Quality**

| Evaluation of Quality             |  |  |  |
|-----------------------------------|--|--|--|
| Monitoring Activity               | Coverage / Authorization   | Provider Selection   | Quality of Care  |
| Accreditation for Non-duplication | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Accreditation for Participation   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Consumer Self-Report data         | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Data Analysis (non-claims)        | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Enrollee Hotlines                 | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Focused Studies                   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Geographic mapping                | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |

| Evaluation of Quality                              |  |  |  |
|--|--|--|--|
| Monitoring Activity                                | Coverage / Authorization   | Provider Selection   | Quality of Care  |
| Independent Assessment                             | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Measure any Disparities by Racial or Ethnic Groups | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Network Adequacy Assurance by Plan                 | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Ombudsman  | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| On-Site Review                                     | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Performance Improvement Projects                   | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Performance Measures                               | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Periodic Comparison of # of Providers              | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM  | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM                                 | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM  |

| Evaluation of Quality                    |  |   |  |
|--|--|---|--|
| Monitoring Activity                      | Coverage / Authorization   | Provider Selection  | Quality of Care  |
|  | <input type="checkbox"/> FFS   | <input type="checkbox"/> FFS  | <input type="checkbox"/> FFS   |
| Profile Utilization by Provider Caseload | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Provider Self-Report Data                | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Test 24/7 PCP Availability               | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |
| Utilization Review                       | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input checked="" type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS |
| Other                                    | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS | <input type="checkbox"/> MCO<br><input type="checkbox"/> PIHP<br><input type="checkbox"/> PAHP<br><input type="checkbox"/> PCCM<br><input type="checkbox"/> FFS            |

## Section B: Monitoring Plan

### Part II: Details of Monitoring Activities

#### Details of Monitoring Activities by Authorized Programs

For each program authorized by this waiver, please provide the details of its monitoring activities by editing each program listed below.

##### Programs Authorized by this Waiver:

| Program          | Type of Program |
|------------------|-----------------|
| State of North C | PIHP;           |

*Note: If no programs appear in this list, please define the programs authorized by this waiver on the*

## Section B: Monitoring Plan

### Part II: Details of Monitoring Activities



**Program Instance: State of North Carolina NC MH/IDD/SAS Health Plan**

Please check each of the monitoring activities below used by the State. A number of common activities are listed below, but the State may identify any others it uses. If federal regulations require a given activity, this is indicated just after the name of the activity. If the State does not use a required activity, it must explain why.

For each activity, the state must provide the following information:

- Personnel responsible (e.g. state Medicaid, other state agency, delegated to plan, EQR, other contractor)
- Detailed description of activity
- Frequency of use
- How it yields information about the area(s) being monitored

- a. ☒ **Accreditation for Non-duplication** (i.e. if the contractor is accredited by an organization to meet certain access, structure/operation, and/or quality improvement standards, and the state determines that the organizations standards are at least as stringent as the state-specific standards required in 42 CFR 438 Subpart D, the state deems the contractor to be in compliance with the state-specific standards)

Activity Details:

PIHPs are required to be accredited by NCQA, URAC or other accreditation agency recognized by CMS for non-duplication and approved by the State. The state ensures that it does not duplicate these activity requirements to the extent possible.

☒ NCQA

☐ JCAHO

☐ AAAHC

☒ Other

Please describe:

URAC

- b. ☐ **Accreditation for Participation** (i.e. as prerequisite to be Medicaid plan)

Activity Details:

☐ NCQA

☐ JCAHO

☐ AAAHC

☐ Other

Please describe:

- c. ☒ **Consumer Self-Report data**

Activity Details:

The State, through its contractor CCME, administers an annual survey for adults and children. The survey measures the consumer perception of the PIHP's performance in areas of access and timeliness of services and quality of care. The state uses the results of these surveys to monitor grievances, timely access, service availability, provider selection and quality of care. The survey includes demographic information including enrollee's age, gender and race or ethnic group.

Survey results are analyzed to create a composite and to measure enrollee satisfaction with care. This information is used to identify issues regarding quality of care. The NC DHHS Intradepartmental Monitoring Team (IMT) reviews these results and may require a written plan to address areas of low performance. Efforts to improve enrollee perception of care are reviewed during quarterly IMT meetings and as part of the EQR process.

☒ **CAHPS**

Please identify which one(s):

Experience of Care and Health Outcomes Survey (ECHO)

☐

State-developed survey

☐

Disenrollment survey

☐

Consumer/beneficiary focus group

d.

☒ **Data Analysis (non-claims)**

Activity Details:

The PIHPs are required to track grievances and appeals. The PIHPs provide this data to the DHHS monthly via a standard monthly monitoring report. The data includes the number of complaints and grievances received per month, and specifies who made the complaint (consumer or provider) and if the complaint or grievance is against the PIHP or a provider. The data also includes the number and percentage of authorization requests denied, the number and percentage of appeals received, and the number of authorization denials overturned due to the appeal. The DHHS Intradepartmental Monitoring Team (IMT) reviews the information on a quarterly basis and may require a written plan of correction to address areas of low performance. The information is also included in the PIHP Quality Management reporting.

Grievance and appeals data is used to monitor grievances and complaints, timely access to services, network capacity, service authorization and quality of care. PIHPs maintain records of grievances and appeals within an internal Continuous Quality Improvement Program. Performance Improvement Projects are implemented when indicated.

☒

Denials of referral requests

☐

Disenrollment requests by enrollee

☐

From plan

☐

From PCP within plan

☒

Grievances and appeals data

☐

Other

Please describe:

e.

☒ **Enrollee Hotlines**

Activity Details:

The NC DHHS operates a toll-free customer hotline to address consumer coverage questions and requests for assistance. The hotline operates 16 hours per day. Items that cannot be addressed by hotline staff are referred to the appropriate program or staff person within DHHS.

The PIHPs are required to operate a toll-free customer service line 24/7 to address enrollee needs and concerns. The PIHPs provide data to the DHHS monthly via a standard monthly monitoring report regarding the total number of calls received, the percentage and number of calls abandoned, the average speed to answer calls, and the number and percentage of calls answered within 30 seconds. The DHHS Intradepartmental Monitoring Team (IMT) reviews the information on a quarterly basis and may require a written plan of correction to address areas of low performance.

Hotline information is used to monitor information to beneficiaries, grievances, timely access, coordination/continuity of care, coverage and authorization, provider selection and quality of care.

- f. ☐ **Focused Studies** (detailed investigations of certain aspects of clinical or non-clinical services at a point in time, to answer defined questions. Focused studies differ from performance improvement projects in that they do not require demonstrable and sustained improvement in significant aspects of clinical care and non-clinical service)

Activity Details:

n/a

- g. ☒ **Geographic mapping**

Activity Details:

The PIHPs are required to maintain geographic mapping of the provider network for the DHHS's review. The geographic mapping identifies the distribution of provider types across the state. Examples of provider types shown through mapping include psychiatrists, psychologists, treatment programs and facilities. Geographic mapping is generated and reported on annually through the PIHPs' submission of an Gaps and Needs analysis. DHHS staff review the information and may require a written plan of correction to address areas of concern. PIHPs are required to report on their progress in addressing gaps during the quarterly IMT process.

Geographic mapping is used to monitor timely access, primary care provider/specialist capacity, and provider selection.

- h. ☐ **Independent Assessment** (Required for first two waiver periods)

Activity Details:

n/a

- i. ☒ **Measure any Disparities by Racial or Ethnic Groups**

Activity Details:

The State, through its contractor CCME, administers an annual survey to measure consumer satisfaction. This survey is used to collect demographic information and to assess cultural sensitivity. Results of the survey are used to identify issues related to quality of care, including racial and ethnic disparities. The Measurement of disparities by racial or ethnic groups is used to monitor timely access and coverage/authorization of care.

- j. ☒ **Network Adequacy Assurance by Plan** [Required for MCO/PIHP/PAHP]

Activity Details:

The PIHPs are required to establish and maintain appropriate provider networks. The PIHP contract with DMA requires PIHPs to establish policies and procedures to monitor the adequacy, accessibility and availability of its provider network to meet the needs of enrollees. The PIHPs conduct an in-depth analysis of their provider networks to demonstrate an appropriate number, mix and geographic distribution of providers, including geographic access of its members to practitioners and facilities.

Network adequacy assurance is generated and reported on annually through the PIHPs' submission of an Gaps and Needs analysis. The PIHPs submit a network development plan to address any reported gaps in service capacity or access. DHHS staff review the information and may require a written plan of correction to address areas of concern. PIHPs are required to report on their progress in addressing gaps during the quarterly IMT process. PIHPs submit requests for exception to DHHS for gaps in service coverage of specialty providers and institutions. PIHPs notify DHHS of any significant change in the PIHP network that would create a gap.

Measurement of network adequacy reports is used to monitor primary care provider/specialist capacity and provider selection.

Network adequacy data is used as follows: 1) develop a quantitative, regional understanding of the healthcare or service delivery system, including the subsystems and their relation; 2) identify needs for further data collection; and 3) identify processes and areas for detailed study.

k. ☐ **Ombudsman**

Activity Details:

n/a

l. ☒ **On-Site Review**

Activity Details:

The state administers annual on-site monitoring reviews through the EQR process using its contractor, CCME. Designated DHHS staff from the Division of Medical Assistance (DMA) and the Division of Mental Health, Developmental Disabilities, and Substance Abuse Services participate in the EQR on-site reviews. The on-site reviews consist of both interviews and documentation review. The EQR process includes an extensive review of PIHP policies, procedures, processes and documentation of PIHP functions. The review focuses on monitoring services, reviewing grievances and appeals received and reviewing medical charts as needed.

The EQR on-site review allows a review of automated systems and communication with the contractor staff that perform each of the above processes. It also obtains additional information that was not gathered during the state monitoring. Data from all sources is analyzed for compliance. If indicated, the contractor is required to implement corrective actions. The EQRO, CCME, compiles the information for all PIHPs and

On-site review is used to monitor marketing, program integrity, information to beneficiaries, grievances, timely access, primary care provider/specialist capacity, coordination/continuity of care, coverage/authorization, provider selection and quality of care.

m. ☒ **Performance Improvement Projects** [Required for MCO/PIHP]

Activity Details:

PIHPs are required to conduct Performance Improvement Projects (PIPs) that are designed to achieve, through on-going measurements and intervention, significant improvement, sustained over time, in clinical care and non-clinical care areas that are expected to have a favorable effect on health outcomes and enrollee satisfaction. The PIHPs were required to develop, implement and report to the state a minimum of two PIHP-specific and self-funded PIPs during the first year of their PIHP contract with DMA. They were required to add a third PIHP in the second year and a fourth in the third year. At least one of the four PIPs must be clinical and at least one must be non-clinical. PIP topics are chosen based upon the information obtained through other monitoring processes.

PIPs must measure performance using objective quality indicators, implementation of system interventions to achieve improvement in quality, evaluation of the effectiveness of the interventions, and planning/initiation of activities for increasing or sustaining improvement. Baseline measures for each PIP are established in the first year of each project and benchmarks are set based on currently accepted standards, past performance data or available national data. PIHPs will need DMAs approval prior to terminating a project. PIHPs will implement new PIPs as projects are terminated.

Two PIPs must be in process each year. The contractor shall report the status and results of each PIP to the DHHS Intradepartmental Monitoring Team (IMT) quarterly. Each PIP must be completed in a reasonable time period so as to generally allow information on the success of PIPs in the aggregate to produce new information on quality of care every year.

PIPs are used to monitor program integrity, coordination/continuity of care, quality of care and access to care. Data from PIPs is used to:

1. Develop a quantitative, regional understanding of the healthcare or service delivery system, including the subsystems and their relation;
2. Identify needs for further data collection; and
3. Identify processes and areas for detailed study.

The results of the analyses are reported to the DHHS IMT. The DHHS Intradepartmental Monitoring Team (IMT) reviews the information on a quarterly basis and may require a written plan of correction to address areas of low performance.

☒ Clinical

☒ Non-clinical

n. ☒ **Performance Measures** [Required for MCO/PIHP]

Activity Details:

The State has established a comprehensive list of Performance Measures (PMs) for the PIHPs. These PMs are included and described in the PIHP / DMA contract. The PIHPs use Health Effectiveness Data and Information Set (HEDIS) technical specifications pertaining to the Medicaid population when applicable. PIHPs report on these measures on a schedule determined by the state. Reports are due on a monthly, quarterly or annual basis.

PIPs are used to monitor grievance, timely access, primary care provider/specialist capacity, coordination/continuity of care, coverage authorization and quality of care. Performance indicator data is reported in the annual Quality Improvement report and is reviewed by the DHHS Intradepartmental Monitoring Team (IMT). The DHHS IMT reviews the information on a quarterly basis and may require a written plan of correction to address areas of low performance.

☒ Process

☒ Health status/ outcomes

☒ Access/ availability of care

☒ Use of services/ utilization

☒ Health plan stability/ financial/ cost of care

☒ Health plan/ provider characteristics

☒ Beneficiary characteristics

- o. ☒ **Periodic Comparison of # of Providers**

Activity Details:

PIHPs report annually on the number and types of Title XIX providers relative to the number and types of Medicaid providers prior to the start date of the contract. The state compares the PIHP provider network numbers and types on an annual basis using results from the PIHP's reported network capacity.

Periodic comparison of number and types of Medicaid providers before and after waiver is used to monitor information related to primary care provider/specialist capacity and provider selection.

- p. ☐ **Profile Utilization by Provider Caseload** (looking for outliers)

Activity Details:

n/a

- q. ☒ **Provider Self-Report Data**

Activity Details:

The State, through its contractor CCME, administers an annual survey to measure provider satisfaction with the PIHPs' performance. The survey includes provider satisfaction with claims submissions, timeliness of payments, assistance from the PIHPs and communications with the PIHPs.

Survey results are analyzed to create a composite and to measure provider satisfaction with the PIHPs. This information is used to identify issues related to the impact of managed care programs on providers. The NC DHHS Intradepartmental Monitoring Team (IMT) reviews these results and may require a written plan to address areas of low performance. Efforts to improve provider satisfaction are reviewed during quarterly IMT meetings and as part of the EQR process.

☐ Survey of providers

☐ Focus groups

- r. ☐ **Test 24/7 PCP Availability**

Activity Details:

n/a

- s. ☒ **Utilization Review** (e.g. ER, non-authorized specialist requests)

Activity Details:

PIHPs are required to conduct statistically valid sample utilization management (UM) reviews on required utilization measures. The PIHPs perform ongoing monitoring of UM data, on-site review results and claims data review. The DHHS Intradepartmental Monitoring Team (IMT) reviews the PIHP utilization review process. PIHPs analyze over and under-utilization through the use of regular utilization and outlier reports. Data related to the utilization review are reported in the PIHP quality report and are reviewed by the IMT annually.

Utilization review is used to monitor program integrity, timely access, coverage/authorization and quality of care. The data is used to indicate opportunities for improvement and to assess compliance with utilization policies and procedures at the provider and contractor level. This information is primarily used for provider and enrollee monitoring and is part of the quality improvement statistical report. Analysis is reported to the IMT. If areas for improvement are noted, the PIHPs work with the specific provider noted or incorporate the identified aspects into the implementation of performance measures. If the utilization review process identifies issues with program integrity, the contractor shall follow up with providers, recoup overpayments or report abusive or fraudulent claiming to the Medicaid Fraud Control Unit via the State Medicaid Agency.

- t. ☒ Other

Activity Details:

PIHPs are required to administer Quality of Life Surveys (QOLS) as part of the August 23, 2012 settlement agreement with the US Department of Justice. The state implemented the QOLSs to be completed by individuals with mental illness who are transitioned out of an adult care home or a State psychiatric hospital to community living as a result of the settlement agreement. The goal of the settlement agreement is to ensure that services and supports to individuals with SMI and SPMI are of good quality, are supportive of these individuals in achieving increased independence and integration in the community, maintaining stable housing in a safe environment, and preventing unnecessary hospitalization and/or institutionalization. The PIHPs, through care and transition coordination and in-reach activities, are responsible for facilitating these transitions and making community based services available to support individuals in their transitions.

Three QOLSs are completed per transition. One is completed prior to transition, 11 months after transition and 24 months after transition. The QOLSs are used to monitor quality of care, timely access, coordination and continuity, and provider selection.

The QOLSs measure various domains which have been identified as indicators of an individual's perception of quality of life. Pre- and post-transition data is compared to determine if the State's goals for the settlement agreement are being met.

## Section C: Monitoring Results

### Renewal Waiver Request

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Section 1915(b) of the Act and 42 CFR 431.55 require that the State must document and maintain data regarding the effect of the waiver on the accessibility and quality of services as well as the anticipated impact of the project on the States Medicaid program. In Section B of this waiver preprint, the State describes how it will assure these requirements are met. For an initial waiver request, the State provides assurance in this Section C that it will report on the results of its monitoring plan when it submits its waiver renewal request. For a renewal request, the State provides evidence that waiver requirements were met for the most recent waiver period. Please use Section D to provide evidence of cost-effectiveness.

CMS uses a multi-pronged effort to monitor waiver programs, including rate and contract review, site visits, reviews of External Quality Review reports on MCOs/PIHPs, and reviews of Independent Assessments. CMS will use the results of these activities and reports along with this Section to evaluate whether the Program Impact, Access, and Quality requirements of the waiver were met.

**This is a renewal request.**

- ☒ **This is the first time the State is using this waiver format to renew an existing waiver.** The State provides below the results of the monitoring activities conducted during the previous waiver period.
- ☐ **The State has used this format previously** The State provides below the results of the monitoring activities conducted during the previous waiver period.

For each of the monitoring activities checked in Section B of the previous waiver request, the State should:

- **Confirm** it was conducted as described in Section B of the previous waiver preprint. If it was not done as described, please explain why.
- **Summarize the results** or findings of each activity. CMS may request detailed results as appropriate.
- **Identify problems** found, if any.
- **Describe plan/provider-level corrective action**, if any, that was taken. The State need not identify the provider/plan by name, but must provide the rest of the required information.
- **Describe system-level program changes**, if any, made as a result of monitoring findings.

**The Monitoring Activities were conducted as described:**

- ☐ Yes ☒ No

If No, please explain:

Monitoring activities were conducted as described. Additional monitoring activities and supplemental information is as follows:

Summary of Monitoring Activities: Other ways of collecting feedback include feedback from advocacy groups, provider organizations, etc. Additional information is collected through complaints and grievances.

Enrollee Hotlines: The NC DHHS Customer Service Center is open during normal business hours. LME-MCOs are required to have 24-hour accessibility.

Consumer Self-Report Data: The PIHPs are given individual reports that include the results for their area. The areas identified for improvement will vary based on PIHP. Each PIHP reviews the results as part of their continuous quality improvement process and determines the root cause for each problem identified in their area. Once the root cause(s) is(are) determined, the PIHP prioritizes action on the problems identified. Performance improvement projects are implemented for prioritized problem areas. These State reviews and approves each performance improvement project prior to implementation and prior to closing the project for completion. These performance improvement projects are reported on and monitored during quarterly Intra-Departmental Monitoring Team meetings with each PIHP. They are also reviewed during the annual External Quality Review.

PIHPs also address areas for improvement related to network accessibility and access during their annual Network Adequacy Analysis and through the development of their Network Development Plan.

Additionally, each PIHP is given the option to develop Medicaid in lieu of services to address gaps in their network. Several PIHPs have taken the initiative to develop Behavioral Health Urgent Care crisis centers in lieu of Medicaid State Plan services to address the access to urgent care gap for their catchment area.

Performance Measures: The 2018/2019 contracts between the PIHPs and North Carolina Medicaid include financial penalties for PIHPs that do not meet the identified benchmark for these measures. PIHPs are highly motivated to improve performance in these areas. Each PIHP has unique qualities based on geography, population, etc. and therefore, the strategies between PIHPs varies. Some strategies include automatic assignment to care coordination for individuals being discharged, co-location of PIHP behavioral health staff in hospital location, patient reminder calls, increasing availability of community providers include after hours and weekend appointments, etc.

Geographic Mapping and Periodic Comparison of Provider: Facility based opioid treatment is a Medicaid State Plan service. There are a limited number of facilities in North Carolina available to operate this service and access is limited in many areas. The goal is to ensure that Medicaid enrollees are getting the services they need. Rather than open new facilities, the State and the PIHPs are working to develop community based opioid treatment options, including the use of Medication Assisted Treatment (MAT) and specialized services by outpatient therapy providers.

Provider Self-Report Data: The EQR results indicate that the PIHPs are meeting the requirements of the appeals process in 42 CFR 438.400-424. There has not been an increase in the number of state-level appeals, nor has there been an increase in provider complaints against the PIHPs. The state does not have any concerns at this time.

**Provide the results of the monitoring activities:**

06/24/2019





**Consumer Self-Report Data**

Summary of results: The Adult & Child ECHO surveys were each sent to approx. 3,900 enrollee households. The response rate was 18.9% for adults & 21.5% for children.

Problems identified: Areas for improvement in adult survey include access to urgent treatment, care coordination, information, person centered plan. Areas identified in child survey include responsiveness to cultural needs, helped by treatment, access to care, person centered plan and care coordination.

Corrective action taken: N/A. PIHPs discuss ECHO report findings at quality improvement committees and create performance improvement projects, as appropriate. The EQR process monitors PIHP steps toward improvement in problem areas.

System level program changes: N/A

**Data Analysis**

Summary: Rate of adverse decisions on service requests has remained low (under 3%), as has the rate of appeals per 1,000 persons served (under 2.0). Rate of appeals that resulted in an overturned decision has varied from 9% to 16%. Resolution of complaints and grievances occur within 30 days 96% of the time. NC Innovations waiver services received a high number of complaints in the months following the implementation of new programs/services. There were no other patterns of complaints.

Problems identified: Service changes increased complaints and grievances.

Corrective action: Continued education by state and PIHP to providers, consumers and other stakeholders.

System level program changes: N/A

**Enrollee Hotlines**

Summary: PIHPs meet required benchmarks in this area. Immediate access to PIHP staff is available 24/7 for urgent issues

Problems identified: N/A

Corrective action: N/A

System level program changes: N/A

**Geographic Mapping**

Summary: PIHPs report an adequate network of providers in most regions for most services. Exceptions were granted for extremely rural areas and specialty providers/facilities. All PIHPs report a gap in facility based opioid treatment.

Problems identified: Gaps in rural areas and for facility based opioid treatment

Corrective action: The State and PIHPs are working together through intradepartmental monitoring and DHHS waiver advisory committees. Goals include appropriate use and access to crisis services to avoid inappropriate ED use; co-location/coordination of primary and specialty care; increase access to psychiatric services in collaboration with the State' PCCM program; work with stakeholders to further the continuum of care for children and adults with substance use issues and to increase access to services in rural areas.

System level program change: Same

**Disparities by Racial/Ethnic Group**

Summary of results: Survey data shows between 65 and 71% of enrollees believe that their services are culturally competent.

Problems identified: No specific issue. PIHPs work toward increased cultural competence.

**Network Adequacy Study**

Summary of results: PIHPs report an adequate network of providers in most regions for most services. Exceptions were granted for rural areas and specialty providers/facilities. PIHPs report a gap in facility based opioid treatment.

Problems identified: Gaps in rural areas and for facility based opioid treatment

Corrective action: See corrective action for Geo Mapping

System level program change: Same

**On-site Review**

Summary of results: PIHPs had on-site reviews annually through the EQR process. Results summarized annual in individual PIHP and comprehensive reports.

Problems identified: Varies based on PIHP and are managed through a corrective action process.

Corrective action: The state provides TA as needed and monitors progress on corrective action items during the quarterly monitoring team meetings.

Program change: N/A

**Performance Improvement Projects**

Summary: PIHPs operate at least 4 ongoing PIPs each. These are validated annually through the EQR process. PIHPs report progress to DHHS during quarterly monitoring meetings.

Problems identified: Varies, based on PIHP.

Corrective action: PIHPs make changes to PIPs when benchmarks have not been met.

Program change: N/A

#### Performance Measures

Summary: Improvement noted across all areas.

Problems identified: Improvement needed for 7-day follow-up after discharge for mental health and substance use disorder services.

Corrective action: PIHPs are developing improvement strategies.

Program change: N/A

#### Periodic Comparison of Providers

Summary: PIHPs report an adequate network of providers in most regions for most services. Exceptions were granted for extremely rural areas and specialty providers/facilities. All PIHPs report a gap in facility based opioid treatment.

Problems identified: Gaps in rural areas and for facility based opioid treatment

Corrective action: See corrective action for Geographic Mapping

System level program change: Same

#### Provider Self-Report Data

Summary: 5,045 providers were sent surveys, with a response rate of 61.7% in 2017. Positive changes were seen in provider satisfaction with local Provider Councils and Provider Network meetings.

Problems identified: There was decreased satisfaction in PIHP service referrals and appeals process.

Corrective action: PIHPs determine if performance improvement projects are needed to improve scores.

System level program change: N/A

#### Utilization Review/Utilization Management

Summary of results: PIHPs have implemented strategies to identify over/under utilization, cost outliers and special needs populations, and are taking steps to ensure the appropriate level of care coordination is available to those who needed it. PIHPs conduct internal training in areas including medical necessity and special needs populations.

Problems identified: No significant problems have been identified.

Corrective action: N/A

Program change: N/A

## Section D: Cost-Effectiveness

### Medical Eligibility Groups

| Title   |  |
|---|--|
| Aid for Families with Dependent Children (AFDC) |  |
| Blind/Disabled and Foster Children              |  |
| Aged  |  |
| Innovations CAP-MR                              |  |
| TBI Waiver                                      |  |
| M-CHIP  |  |

|  | First Period |            | Second Period |            |
|--|--------------|------------|---------------|------------|
|  | Start Date   | End Date   | Start Date    | End Date   |
| Actual Enrollment for the Time Period**                                    | 08/01/2016   | 07/31/2017 | 08/01/2017    | 03/31/2018 |
| Enrollment Projections for the Time Period*                                | 10/01/2018   | 09/30/2019 | 10/01/2019    | 09/30/2020 |
| **Include actual data and dates used in conversion - no estimates          |              |            |               |            |
| *Projections start on Quarter and include data for requested waiver period |              |            |               |            |

## Section D: Cost-Effectiveness

**Services Included in the Waiver****Document the services included in the waiver cost-effectiveness analysis:**

| Service Name                                       | State Plan Service                  | 1915(b)(3) Service                  | Included in Actual Waiver Cost      |  |
|--|-------------------------------------|-------------------------------------|-------------------------------------|--|
| Inpatient Hospital - Psych                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Emergency Room Services with Primary MH/SA/DD Dx   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Outpatient Clinic - Psych                          | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Psychiatrist Services - including E&M codes        | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Behavioral Health Long-Term Residential - Children | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Mobile Crisis Management                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Professional Treatment in facility based crisis    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Diagnostic Assessment                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Community Support                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Targeted Case Management                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Assertive Community Treatment Team                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Multi-Systemic Therapy                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Intensive In-Home Services                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Child/Adolescent Day Treatment                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Partial Hospitalization                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Psychosocial Rehabilitation                        | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| SA-Detox   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| SA - Residential Rehab                             | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| SA - Rehab (SAIOP and SACOT)                       | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Opioid Treatment                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Innovations Waiver Services                        | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| TBI Waiver Services                                | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| Prescribed Drugs - BH                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |  |
| ICF-MR   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |
| Respite  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Supported Employment                               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Personal Care (Individual Support)                 | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| One-Time Transitional Costs                        | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Psychosocial Rehab (Peer Supports)                 | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Innovations Waiver Services                        | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |

| Service Name                | State Plan Service       | 1915(b)(3) Service                  | Included in Actual Waiver Cost |  |
|-----------------------------|--------------------------|-------------------------------------|--------------------------------|--|
| Physician Consultation      | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>       |  |
| Community Guide             | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>       |  |
| In-Home Skill Building      | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>       |  |
| Transitional Living Skills  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>       |  |
| Intensive Recovery Supports | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>       |  |

**Section D: Cost-Effectiveness****Part I: State Completion Section****A. Assurances****a. [Required] Through the submission of this waiver, the State assures CMS:**

- The fiscal staff in the Medicaid agency has reviewed these calculations for accuracy and attests to their correctness.
- The State assures CMS that the actual waiver costs will be less than or equal to or the States waiver cost projection.
- Capitated rates will be set following the requirements of 42 CFR 438.6(c) and will be submitted to the CMS Regional Office for approval.
- Capitated 1915(b)(3) services will be set in an actuarially sound manner based only on approved 1915(b)(3) services and their administration subject to CMS RO prior approval.
- The State will monitor, on a regular basis, the cost-effectiveness of the waiver (for example, the State may compare the PMPM Actual Waiver Cost from the CMS 64 to the approved Waiver Cost Projections). If changes are needed, the State will submit a prospective amendment modifying the Waiver Cost Projections.
- The State will submit quarterly actual member month enrollment statistics by MEG in conjunction with the States submitted CMS-64 forms.

**Signature:**

Betty Staton

State Medicaid Director or Designee

**Submission Date:**

Jun 18, 2019

**Note: The Signature and Submission Date fields will be automatically completed when the State Medicaid Director submits the application.**

**b. Name of Medicaid Financial Officer making these assurances:**

Christal Kelly

**c. Telephone Number:**

(919) 814-0066

**d. E-mail:**

christal.kelly@dhhs.nc.gov

**e. The State is choosing to report waiver expenditures based on**

- ☒ date of payment.
- ☐ date of service within date of payment. The State understands the additional reporting requirements in the CMS-64 and has used the cost effectiveness spreadsheets designed specifically for reporting by date of service within day of payment. The State will submit an initial test upon the first renewal and then an initial and final test (for the preceding 4 years) upon the second renewal and thereafter.

**Section D: Cost-Effectiveness**

**Part I: State Completion Section****B. Expedited or Comprehensive Test**

To provide information on the waiver program to determine whether the waiver will be subject to the Expedited or Comprehensive cost effectiveness test. *Note: All waivers, even those eligible for the Expedited test, are subject to further review at the discretion of CMS and OMB.*

- b. ☒ The State provides additional services under 1915(b)(3) authority.
- c. ☒ The State makes enhanced payments to contractors or providers.
- d. ☒ The State uses a sole-source procurement process to procure State Plan services under this waiver.
- e. ☐ The State uses a sole-source procurement process to procure State Plan services under this waiver. *Note: do not mark this box if this is a waiver for transportation services and dental pre-paid ambulatory health plans (PAHPs) that has overlapping populations with another waiver meeting one of these three criteria. For transportation and dental waivers alone, States do not need to consider an overlapping population with another waiver containing additional services, enhanced payments, or sole source procurement as a trigger for the comprehensive waiver test. However, if the transportation services or dental PAHP waiver meets the criteria in a, b, or c for additional services, enhanced payments, or sole source procurement then the State should mark the appropriate box and process the waiver using the Comprehensive Test.*

If you marked any of the above, you must complete the entire preprint and your renewal waiver is subject to the Comprehensive Test. If you did not mark any of the above, your renewal waiver (not conversion or initial waiver) is subject to the Expedited Test:

- Do not complete *Appendix D3*
- Your waiver will not be reviewed by OMB *at the discretion of CMS and OMB.*

The following questions are to be completed in conjunction with the Worksheet Appendices. All narrative explanations should be included in the preprint. Where further clarification was needed, we have included additional information in the preprint.

**Section D: Cost-Effectiveness****Part I: State Completion Section****C. Capitated portion of the waiver only: Type of Capitated Contract**

The response to this question should be the same as in A.I.b.

- a. ☐ MCO
- b. ☒ PIHP
- c. ☐ PAHP
- d. ☐ PCCM
- e. ☐ Other

Please describe:

**Section D: Cost-Effectiveness****Part I: State Completion Section****D. PCCM portion of the waiver only: Reimbursement of PCCM Providers**

Under this waiver, providers are reimbursed on a fee-for-service basis. PCCMs are reimbursed for patient management in the following manner (please check and describe):

- a. ☐ **Management fees are expected to be paid under this waiver.**

The management fees were calculated as follows.

1. ☐ Year 1: \$  per member per month fee.
2. ☐ Year 2: \$  per member per month fee.
3. ☐ Year 3: \$  per member per month fee.
4. ☐ Year 4: \$  per member per month fee.

- b. ☐ **Enhanced fee for primary care services.**

Please explain which services will be affected by enhanced fees and how the amount of the enhancement was determined.

- c. ☐ **Bonus payments from savings generated under the program are paid to case managers who control beneficiary utilization.** Under **D.I.H.d.**, please describe the criteria the State will use for awarding the incentive payments, the method for calculating incentives/bonuses, and the monitoring the State will have in place to ensure that total payments to the providers do not exceed the Waiver Cost Projections (Appendix D5). Bonus payments and incentives for reducing utilization are limited to savings of State Plan service costs under the waiver. Please also describe how the State will ensure that utilization is not adversely affected due to incentives inherent in the bonus payments. The costs associated with any bonus arrangements must be accounted for in Appendix D3. Actual Waiver Cost.

- d. ☐ **Other reimbursement method/amount.**

\$

Please explain the State's rationale for determining this method or amount.

## Section D: Cost-Effectiveness

### Part I: State Completion Section

#### E. Member Months

Please mark all that apply.

- a. ☒ [Required] Population in the base year and R1 and R2 data is the population under the waiver.
- b. ☒ For a renewal waiver, because of the timing of the waiver renewal submittal, the State did not have a complete R2 to submit. Please ensure that the formulas correctly calculated the annualized trend rates. *Note: it is no longer acceptable to estimate enrollment or cost data for R2 of the previous waiver period.*
- c. ☒ [Required] Explain the reason for any increase or decrease in member months projections from the base year or over time:

Enrollment projections are based on historical enrollment trends. More reliance was placed on recent quarters, which suggest slowing growth for the population. Additionally, the enrollment trend from R5-P1 for the Innovations - CAP-MR MEG considers the slot increases effective January 1, 2018 planned for this population under the concurrent 1915(c) waiver. This increase in slots was observed in January – June 2018 capitation payment data and the trend assumption accounts for the partial reflection in the R5 data.

Below is a chart that summarizes the historical membership trends by quarter and MEG used as the basis for determining the R1–P1 and P1–P5 membership trends:

| MEG  | R5-P1 Quarterly<br>Projected Trends | P1-P5 Quarterly<br>Projected Trends |
|--|-------------------------------------|-------------------------------------|
| MEG 01 AFDC                                  | 0.5%                                | 0.5%                                |
| Meg 02 Blind/Disabled<br>and Foster Children | 1.5%                                | 1.5%                                |
| MEG 03 Aged                                  | 0.0%                                | 0.0%                                |
| MEG 04 Innovations<br>CAP-MR                 | 0.5%                                | 0.5%                                |
| MEG 05 M-CHIP                                | 0.5%                                | 0.5%                                |
| Total  | 0.7%                                | 0.7%                                |

Effective January 1, 2018, the State seeks to implement a 1915(c) waiver to provide HCBS services to individuals with a Traumatic Brain Injury (TBI). This program will initially serve as a pilot program in the Alliance catchment area, which includes Cumberland, Durham, Johnston and Wake counties. HCBS services will be provided in lieu of Institutional services that could have been provided in Rehabilitation Hospitals, Chronic Care Hospitals or Skilled Nursing Facilities. A new TBI Waiver MEG was built into the waiver to track these individuals separately. Mercer utilized the requested waiver slots for the 1915(c) waiver to assign enrollment for this MEG (49 and 99 eligibles for the first and second year, respectively). No additional growth was assumed for the population beyond the number of requested waiver slots.

- d. ☒ [Required] Explain any other variance in eligible member months from BY/R1 to P2:

There are no other variances in the enrollment projections

- e. ☒ [Required] Specify whether the BY/R1/R2 is a State fiscal year (SFY), Federal fiscal year (FFY), or other period:

R1 – R4 reflect August through September time periods (e.g. R1 is August 1, 2013 through July 31, 2014 and R2 is August 1, 2014 through July 31, 2015). R5 includes data from the August 2017 through June 2018 time period.

## Appendix D1 Member Months

## Section D: Cost-Effectiveness

## Part I: State Completion Section

### F. Appendix D2.S - Services in Actual Waiver Cost

#### For Conversion or Renewal Waivers:

- a. ☒ [Required] Explain if different services are included in the Actual Waiver Cost from the previous period in Appendix D3 than for the upcoming waiver period in Appendix D5.  
Explain the differences here and how the adjustments were made on Appendix D5:



The total actual waiver costs reported on Appendix D3, including total service and administration costs, are summarized directly from the waiver reporting schedules, specifically Schedule F. Total service costs were allocated to capitated state plan and 1915(b)(3) services using supplemental calculations. 1915(b)(3) costs are summarized from the separately certified 1915(b)(3) service rates multiplied by the actual member months under the waiver. The remaining costs were allocated to capitated state plan expenditures.

Appendix D5 reflects the statewide expansion effective P1 of three 1915(b)(3) services, including in-home skill building, transitional living, and independent support, which were piloted by Cardinal Innovations in the prior waiver. This change, along with other anticipated increases in 1915(b)(3) spending, are reflected in the P1 service adjustment on Appendix D5.

**b. ☒ [Required] Explain the exclusion of any services from the cost-effectiveness analysis.**

For States with multiple waivers serving a single beneficiary, please document how all costs for waiver covered individuals taken into account.

Audited CMS 64 reports were used as the basis of the cost effectiveness analysis. All services covered under the waiver are included in the cost-effectiveness analysis. Costs for services in the Innovations Program are included in the analysis. Acute care services under the 1932 SPA are excluded from the cost-effectiveness. The State has documented that for a single beneficiary under the 1932 SPA and the (b)(c) concurrent waiver all costs for individuals are reported on either the CMS 64.9 Waiver forms for the 1915(b)(c) concurrent waivers or on the CMS 64.9 Base form with other 1932 SPA costs.

NC is in discussions with CMS on a 1115 waiver that would authorize broader delivery system reforms including comprehensive managed care. The proposed 1115 waiver would phase in comprehensive managed care for the populations currently covered under this 1915(b) waiver. Once the 1115 waiver is approved and the effective dates of changes for the current 1915(b) populations are confirmed, the State will submit an amendment to the 1915(b) waiver to address required changes. The intent is that Medicaid eligibles are only covered through either the 1115 waiver or the 1915(b) waiver.

**Appendix D2.S: Services in Waiver Cost**

| State Plan Services   | MCO<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>MCO | PCCM FFS<br>Reimbursement | PIHP<br>Capitated<br>Reimbursement  | FFS<br>Reimbursement<br>impacted by<br>PIHP | PAHP<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>PAHP |
|---|-----------------------------------|--|---------------------------|-------------------------------------|---|------------------------------------|---|
| Inpatient Hospital<br>- Psych                               | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Emergency Room<br>Services with<br>Primary<br>MH/SA/DD Dx   | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Outpatient Clinic<br>- Psych                                | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Psychiatrist<br>Services -<br>including E&M<br>codes        | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Behavioral Health<br>Long-Term<br>Residential -<br>Children | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Mobile Crisis<br>Management                                 | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Professional<br>Treatment in<br>facility based<br>crisis    | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |

| State Plan Services                | MCO<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>MCO | PCCM FFS<br>Reimbursement | PIHP<br>Capitated<br>Reimbursement  | FFS<br>Reimbursement<br>impacted by<br>PIHP | PAHP<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>PAHP |
|------------------------------------|-----------------------------------|--|---------------------------|-------------------------------------|---|------------------------------------|---|
| Diagnostic Assessment              | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Community Support                  | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Targeted Case Management           | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Assertive Community Treatment Team | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Multi-Systemic Therapy             | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Intensive In-Home Services         | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Child/Adolescent Day Treatment     | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Partial Hospitalization            | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Psychosocial Rehabilitation        | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| SA-Detox                           | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| SA - Residential Rehab             | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| SA - Rehab (SAIOP and SACOT)       | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Opioid Treatment                   | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Innovations Waiver Services        | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| TBI Waiver Services                | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Prescribed Drugs - BH              | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input checked="" type="checkbox"/>         | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| ICF-MR                             | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Respite                            | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Supported Employment               | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Personal Care (Individual Support) | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| One-Time Transitional Costs        | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Psychosocial Rehab (Peer Supports) | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Innovations Waiver Services        | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Physician Consultation             | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>            | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |

| State Plan Services               | MCO<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>MCO | PCCM FFS<br>Reimbursement | PIHP<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>PIHP | PAHP<br>Capitated<br>Reimbursement | FFS<br>Reimbursement<br>impacted by<br>PAHP |
|-----------------------------------|-----------------------------------|--|---------------------------|------------------------------------|---|------------------------------------|---|
| Community Guide                   | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>           | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| In-Home Skill<br>Building         | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>           | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Transitional<br>Living Skills     | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>           | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |
| Intensive<br>Recovery<br>Supports | <input type="checkbox"/>          | <input type="checkbox"/>                   | <input type="checkbox"/>  | <input type="checkbox"/>           | <input type="checkbox"/>                    | <input type="checkbox"/>           | <input type="checkbox"/>                    |

## Section D: Cost-Effectiveness

### Part I: State Completion Section

#### G. Appendix D2.A - Administration in Actual Waiver Cost

**[Required]** The State allocated administrative costs between the Fee-for-service and managed care program depending upon the program structure. *Note: initial programs will enter only FFS costs in the BY. Renewal and Conversion waivers will enter all waiver and FFS administrative costs in the R1 and R2 or BY.*

The allocation method for either initial or renewal waivers is explained below:

- a. ☐ The State allocates the administrative costs to the managed care program based upon the number of waiver enrollees as a percentage of total Medicaid enrollees *Note: this is appropriate for MCO/PCCM programs.*
- b. ☒ The State allocates administrative costs based upon the program cost as a percentage of the total Medicaid budget. It would not be appropriate to allocate the administrative cost of a mental health program based upon the percentage of enrollees enrolled. *Note: this is appropriate for statewide PIHP/PAHP programs.*
- c. ☐ Other  
Please explain:

#### Appendix D2.A: Administration in Actual Waiver Cost

## Section D: Cost-Effectiveness

### Part I: State Completion Section

#### H. Appendix D3 - Actual Waiver Cost

- a. ☒ The State is requesting a 1915(b)(3) waiver in **Section A.I.A.1.c** and will be providing non-state plan medical services. The State will be spending a portion of its waiver savings for additional services under the waiver.

For a renewal or conversion waiver, in the chart below, please state the actual amount spent on each 1915(b)(3) service in the retrospective waiver period. This amount must be built into the States Actual Waiver Cost for R1 and R2 (BY for Conversion) on **Column H in Appendix D3**. Please state the aggregate amount of 1915(b)(3) savings budgeted for each additional service in the upcoming waiver period in the chart below. This amount must be built into the States Waiver Cost Projection for P1 and P2 on **Column W in Appendix D5**.

| 1915(b)(3) Service                                 | Amount Spent in Retrospective Period   | Inflation projected   | Amount projected to be spent in Prospective Period  |
|--|--|---|---|
| Inpatient Hospital - Psych                         |  |   |   |
| Emergency Room Services with Primary MH/SA/DD Dx   |  |   |   |
| Outpatient Clinic - Psych                          |  |   |   |
| Psychiatrist Services - including E&M codes        |  |   |   |
| Behavioral Health Long-Term Residential - Children |  |   |   |
| Mobile Crisis Management                           |  |   |   |
| Professional Treatment in facility based crisis    |  |   |   |
| Diagnostic Assessment                              |  |   |   |
| Community Support                                  |  |   |   |
| Targeted Case Management                           |  |   |   |
| Assertive Community Treatment Team                 |  |   |   |
| Total:   | \$57,062,970 or<br>\$3.45 PMPM in R1<br>\$60,847,741 or<br>\$3.32 PMPM in R2<br>\$49,226,010 or<br>\$2.66 PMPM in R3<br>\$76,724,508 or<br>\$3.83 PMPM in R4<br>\$98,209,244 or<br>\$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service             | Amount Spent in Retrospective Period   | Inflation projected   | Amount projected to be spent in Prospective Period  |
|--------------------------------|--|---|---|
|                                |  |   |   |
| Multi-Systemic Therapy         |  |   |   |
| Intensive In-Home Services     |  |   |   |
| Child/Adolescent Day Treatment |  |   |   |
| Partial Hospitalization        |  |   |   |
| Psychosocial Rehabilitation    |  |   |   |
| SA-Detox                       |  |   |   |
| SA - Residential Rehab         |  |   |   |
| SA - Rehab (SAIOP and SACOT)   |  |   |   |
| Opioid Treatment               |  |   |   |
| Innovations Waiver Services    |  |   |   |
| Total:                         | \$57,062,970 or<br>\$3.45 PMPM in R1<br>\$60,847,741 or<br>\$3.32 PMPM in R2<br>\$49,226,010 or<br>\$2.66 PMPM in R3<br>\$76,724,508 or<br>\$3.83 PMPM in R4<br>\$98,209,244 or<br>\$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service    | Amount Spent in Retrospective Period   | Inflation projected   | Amount projected to be spent in Prospective Period  |
|-----------------------|--|---|---|
|                       |  |   |   |
| TBI Waiver Services   |  |   |   |
| Prescribed Drugs - BH |  |   |   |
| ICF-MR                |  |   |   |
| Respite               | \$5,983,621 or<br>\$0.36 PMPM in R1<br>\$6,380,492 or<br>\$0.35 PMPM in R2<br>\$5,161,837 or<br>\$0.28 PMPM in R3<br>\$8,045,329 or<br>\$0.40 PMPM in R4<br>\$10,298,217 or<br>\$0.55 PMPM in R5     | 3.1% inflation and 77.2% adjustment equate to \$0.47 increase in P2<br>3.1% inflation equates to \$0.03 increase in P2<br>3.1% inflation equates to \$0.04 increase in P3<br>3.1% inflation equates to \$0.03 increase in P4<br>3.1% inflation equates to \$0.03 increase in P5 | \$1.02 PMPM in P1<br>\$1.05 PMPM in P2<br>\$1.09 PMPM in P3<br>\$1.12 PMPM in P4<br>\$1.15 PMPM in P5     |
| Supported Employment  |  |   | \$0.16 PMPM in P1<br>\$0.16 PMPM in P2<br>\$0.17 PMPM in P3<br>\$0.17 PMPM in P4<br>\$0.18 PMPM in P5     |
| Total:                | \$57,062,970 or<br>\$3.45 PMPM in R1<br>\$60,847,741 or<br>\$3.32 PMPM in R2<br>\$49,226,010 or<br>\$2.66 PMPM in R3<br>\$76,724,508 or<br>\$3.83 PMPM in R4<br>\$98,209,244 or<br>\$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service                 | Amount Spent in Retrospective Period   | Inflation projected  | Amount projected to be spent in Prospective Period  |
|------------------------------------|--|--|---|
|                                    | \$457,876 or<br>\$0.03 PMPM in R1<br>\$488,246 or<br>\$0.03 PMPM in R2<br>\$394,992 or<br>\$0.02 PMPM in R3<br>\$615,642 or<br>\$0.03 PMPM in R4<br>\$788,036 or<br>\$0.04 PMPM in R5                | 3.1% inflation and 77.2% adjustment<br>equate to \$0.12 increase in P2<br>3.1% inflation equates to \$0.00 increase in P2<br>3.1% inflation equates to \$0.01 increase in P3<br>3.1% inflation equates to \$0.00 increase in P4<br>3.1% inflation equates to \$0.01 increase in P5 |   |
| Personal Care (Individual Support) | \$7,868,230 or<br>\$0.48 PMPM in R1<br>\$8,390,100 or<br>\$0.46 PMPM in R2<br>\$6,787,617 or<br>\$0.37 PMPM in R3<br>\$10,579,297 or<br>\$0.53 PMPM in R4<br>\$13,541,758 or<br>\$0.73 PMPM in R5    | 3.1% inflation and 77.2% adjustment<br>equate to \$0.61 increase in P2<br>3.1% inflation equates to \$0.05 increase in P2<br>3.1% inflation equates to \$0.04 increase in P3<br>3.1% inflation equates to \$0.04 increase in P4<br>3.1% inflation equates to \$0.05 increase in P5 | \$1.34 PMPM in P1<br>\$1.39 PMPM in P2<br>\$1.43 PMPM in P3<br>\$1.47 PMPM in P4<br>\$1.52 PMPM in P5     |
| One-Time Transitional Costs        |  |  | \$0.00 PMPM in P1<br>\$0.00 PMPM in P2<br>\$0.00 PMPM in P3<br>\$0.00 PMPM in P4<br>\$0.00 PMPM in P5     |
| Total:                             | \$57,062,970 or<br>\$3.45 PMPM in R1<br>\$60,847,741 or<br>\$3.32 PMPM in R2<br>\$49,226,010 or<br>\$2.66 PMPM in R3<br>\$76,724,508 or<br>\$3.83 PMPM in R4<br>\$98,209,244 or<br>\$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment<br>equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service                 | Amount Spent in Retrospective Period   | Inflation projected   | Amount projected to be spent in Prospective Period   |
|------------------------------------|--|---|--|
|                                    | \$25,125 or \$0.00 PMPM in R1<br>\$26,792 or \$0.00 PMPM in R2<br>\$21,675 or \$0.00 PMPM in R3<br>\$33,783 or \$0.00 PMPM in R4<br>\$43,243 or \$0.00 PMPM in R5  | 3.1% inflation and 77.2% adjustment equate to \$0.00 increase in P2<br>3.1% inflation equates to \$0.00 increase in P2<br>3.1% inflation equates to \$0.00 increase in P3<br>3.1% inflation equates to \$0.00 increase in P4<br>3.1% inflation equates to \$0.00 increase in P5 |  |
| Psychosocial Rehab (Peer Supports) | \$30,195,211 or \$1.82 PMPM in R1<br>\$32,197,945 or \$1.76 PMPM in R2<br>\$26,048,237 or \$1.41 PMPM in R3<br>\$40,599,231 or \$2.03 PMPM in R4<br>\$51,968,007 or \$2.80 PMPM in R5<br>\$6,519,242 or \$0.39 PMPM in R1<br>\$6,951,639 or \$0.38 PMPM in R2<br>\$5,623,898 or \$0.30 PMPM in R3<br>\$8,765,504 or \$0.44 PMPM in R4<br>\$11,220,059 or \$0.60 PMPM in R5 |   | \$5.16 PMPM in P1<br>\$5.32 PMPM in P2<br>\$5.48 PMPM in P3<br>\$5.65 PMPM in P4<br>\$5.82 PMPM in P5<br>\$1.11 PMPM in P1<br>\$1.15 PMPM in P2<br>\$1.18 PMPM in P3<br>\$1.22 PMPM in P4<br>\$1.26 PMPM in P5 |
| Total:                             | \$57,062,970 or \$3.45 PMPM in R1<br>\$60,847,741 or \$3.32 PMPM in R2<br>\$49,226,010 or \$2.66 PMPM in R3<br>\$76,724,508 or \$3.83 PMPM in R4<br>\$98,209,244 or \$5.29 PMPM in R5  | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5  |



| 1915(b)(3) Service          | Amount Spent in Retrospective Period  | Inflation projected   | Amount projected to be spent in Prospective Period  |
|-----------------------------|---|---|---|
|                             |   | 3.1% inflation and 77.2% adjustment = \$2.36 increase in P2<br>3.1% inflation = \$0.16 increase in P2<br>3.1% = to \$0.16 increase in P3<br>3.1% = to \$0.17 increase in P4<br>3.1% = \$0.17 increase in P5<br>3.1% and 78.5% adjustment = to \$0.51 increase in P2<br>3.1% = \$0.04 increase in P2<br>3.1% = \$0.03 increase in P3<br>3.1% = \$0.04 increase in P4<br>3.1% = \$0.04 increase in P5 |   |
| Innovations Waiver Services | \$4,980,937 or \$0.30 PMPM in R1<br>\$5,311,304 or \$0.29 PMPM in R2<br>\$4,296,861 or \$0.23 PMPM in R3<br>\$6,697,162 or \$0.33 PMPM in R4<br>\$8,572,531 or \$0.46 PMPM in R5      |   | \$0.99 PMPM in P1<br>\$1.02 PMPM in P2<br>\$1.05 PMPM in P3<br>\$1.08 PMPM in P4<br>\$1.11 PMPM in P5     |
| Total:                      | \$57,062,970 or \$3.45 PMPM in R1<br>\$60,847,741 or \$3.32 PMPM in R2<br>\$49,226,010 or \$2.66 PMPM in R3<br>\$76,724,508 or \$3.83 PMPM in R4<br>\$98,209,244 or \$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5   | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service     | Amount Spent in Retrospective Period  | Inflation projected   | Amount projected to be spent in Prospective Period  |
|------------------------|---|---|---|
|                        |   | 3.1% inflation and 77.2% adjustment equate to \$0.53 increase in P2<br>3.1% inflation equates to \$0.03 increase in P2<br>3.1% inflation equates to \$0.03 increase in P3<br>3.1% inflation equates to \$0.03 increase in P4<br>3.1% inflation equates to \$0.03 increase in P5 |   |
| Physician Consultation | \$2,329 or \$0.00 PMPM in R1<br>\$2,484 or \$0.00 PMPM in R2<br>\$2,010 or \$0.00 PMPM in R3<br>\$3,132 or \$0.00 PMPM in R4<br>\$4,009 or \$0.00 PMPM in R5                          | 3.1% inflation and 77.2% adjustment equate to \$0.00 increase in P2<br>3.1% inflation equates to \$0.00 increase in P2<br>3.1% inflation equates to \$0.00 increase in P3<br>3.1% inflation equates to \$0.00 increase in P4<br>3.1% inflation equates to \$0.00 increase in P5 | \$0.00 PMPM in P1<br>\$0.00 PMPM in P2<br>\$0.00 PMPM in P3<br>\$0.00 PMPM in P4<br>\$0.00 PMPM in P5     |
| Community Guide        |   |   | \$0.17 PMPM in P1<br>\$0.18 PMPM in P2<br>\$0.18 PMPM in P3<br>\$0.19 PMPM in P4<br>\$0.20 PMPM in P5     |
| Total:                 | \$57,062,970 or \$3.45 PMPM in R1<br>\$60,847,741 or \$3.32 PMPM in R2<br>\$49,226,010 or \$2.66 PMPM in R3<br>\$76,724,508 or \$3.83 PMPM in R4<br>\$98,209,244 or \$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service          | Amount Spent in Retrospective Period   | Inflation projected  | Amount projected to be spent in Prospective Period  |
|-----------------------------|--|--|---|
|                             | \$1,013,487 or<br>\$0.06 PMPM in R1<br>\$1,080,708 or<br>\$0.06 PMPM in R2<br>\$874,296 or<br>\$0.05 PMPM in R3<br>\$1,362,694 or<br>\$0.07 PMPM in R4<br>\$1,744,280 or<br>\$0.09 PMPM in R5        | 3.1% inflation and 77.2% adjustment<br>equate to \$0.08 increase in P2<br>3.1% inflation equates to \$0.01 increase in P2<br>3.1% inflation equates to \$0.00 increase in P3<br>3.1% inflation equates to \$0.01 increase in P4<br>3.1% inflation equates to \$0.01 increase in P5 |   |
| In-Home Skill Building      |  |  |   |
| Transitional Living Skills  |  |  |   |
| Intensive Recovery Supports | \$16,728 or \$0.00 PMPM in R1<br>\$17,838 or \$0.00 PMPM in R2<br>\$14,431 or \$0.00 PMPM in R3<br>\$22,492 or \$0.00 PMPM in R4<br>\$28,791 or \$0.00 PMPM in R5                                    |  | \$0.01 PMPM in P1<br>\$0.01 PMPM in P2<br>\$0.01 PMPM in P3<br>\$0.01 PMPM in P4<br>\$0.01 PMPM in P5     |
| Total:                      | \$57,062,970 or<br>\$3.45 PMPM in R1<br>\$60,847,741 or<br>\$3.32 PMPM in R2<br>\$49,226,010 or<br>\$2.66 PMPM in R3<br>\$76,724,508 or<br>\$3.83 PMPM in R4<br>\$98,209,244 or<br>\$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment<br>equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

| 1915(b)(3) Service | Amount Spent in Retrospective Period  | Inflation projected   | Amount projected to be spent in Prospective Period  |
|--------------------|---|---|---|
|                    |   | 3.1% inflation and 77.2% adjustment equate to \$0.01 increase in P2<br>3.1% inflation equates to \$0.00 increase in P2<br>3.1% inflation equates to \$0.00 increase in P3<br>3.1% inflation equates to \$0.00 increase in P4<br>3.1% inflation equates to \$0.00 increase in P5 |   |
| Total:             | \$57,062,970 or \$3.45 PMPM in R1<br>\$60,847,741 or \$3.32 PMPM in R2<br>\$49,226,010 or \$2.66 PMPM in R3<br>\$76,724,508 or \$3.83 PMPM in R4<br>\$98,209,244 or \$5.29 PMPM in R5 | 3.1% inflation and 77.2% adjustment equate to \$4.69 increase in P2<br>3.1% inflation equates to \$0.32 increase in P2<br>3.1% inflation equates to \$0.31 increase in P3<br>3.1% inflation equates to \$0.32 increase in P4<br>3.1% inflation equates to \$0.34 increase in P5 | \$9.97 PMPM in P1<br>\$10.27 PMPM in P2<br>\$10.59 PMPM in P3<br>\$10.91 PMPM in P4<br>\$11.25 PMPM in P5 |

- b. ☐ **The State is including voluntary populations in the waiver.**

Describe below how the issue of selection bias has been addressed in the Actual Waiver Cost calculations:

- c. ☒ **Capitated portion of the waiver only -- Reinsurance or Stop/Loss Coverage:** Please note how the State will be providing or requiring reinsurance or stop/loss coverage as required under the regulation. States may require MCOs/PIHPs/PAHPs to purchase reinsurance. Similarly, States may provide stop-loss coverage to MCOs/PIHPs/PAHPs when MCOs/PIHPs/PAHPs exceed certain payment thresholds for individual enrollees. Stop loss provisions usually set limits on maximum days of coverage or number of services for which the MCO/PIHP/PAHP will be responsible. If the State plans to provide stop/loss coverage, a description is required. The State must document the probability of incurring costs in excess of the stop/loss level and the frequency of such occurrence based on FFS experience. The expenses per capita (also known as the stoploss premium amount) should be deducted from the capitation year projected costs. In the initial application, the effect should be neutral. In the renewal report, the actual reinsurance cost and claims cost should be reported in Actual Waiver Cost.

**Basis and Method:**

1. ☐ **The State does not provide stop/loss protection for MCOs/PIHPs/PAHPs, but requires MCOs/PIHPs/PAHPs to purchase reinsurance coverage privately. No adjustment was necessary.**

2. ☒ **The State provides stop/loss protection**

Describe below how the issue of selection bias has been addressed in the Actual Waiver Cost

calculations:

The State's capitated contract with the PIHPs contains a requirement for a risk reserve account. The State will explicitly include 2% in the administrative portion of the capitated rate to fund this account. This account will accumulate up to a maximum of 15% of annual premiums and be used to fund periodic shortfalls in capitation revenue if monthly expenses exceed revenue consistent with CMS financial solvency guidelines. Given this arrangement, the State has chosen not to require additional stop/loss protection for this programs.

d. ☐ **Incentive/bonus/enhanced Payments for both Capitated and fee-for-service Programs:**

1. ☐ **[For the capitated portion of the waiver] the total payments under a capitated contract include any incentives the State provides in addition to capitated payments under the waiver program.** The costs associated with any bonus arrangements must be accounted for in the capitated costs (Column D of Appendix D3 Actual Waiver Cost). Regular State Plan service capitated adjustments would apply.

**Document**

- i. Document the criteria for awarding the incentive payments.
- ii. Document the method for calculating incentives/bonuses, and
- iii. Document the monitoring the State will have in place to ensure that total payments to the MCOs/PIHPs/PAHPs do not exceed the Waiver Cost Projection.

2. ☐ **For the fee-for-service portion of the waiver, all fee-for-service must be accounted for in the fee-for-service incentive costs (Column G of Appendix D3 Actual Waiver Cost).** For PCCM providers, the amount listed should match information provided in D.I.D Reimbursement of Providers. Any adjustments applied would need to meet the special criteria for fee-for-service incentives if the State elects to provide incentive payments in addition to management fees under the waiver program (See D.I.I.e and D.I.J.e)

**Document:**

- i. Document the criteria for awarding the incentive payments.
- ii. Document the method for calculating incentives/bonuses, and
- iii. Document the monitoring the State will have in place to ensure that total payments to the MCOs/PIHPs/PAHPs/PCCMs do not exceed the Waiver Cost Projection.

**Appendix D3 Actual Waiver Cost**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (1 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (2 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (3 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (4 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (5 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (6 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (7 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**I. Appendix D4 - Adjustments in the Projection OR Conversion Waiver for DOS within DOP (8 of 8)**

**This section is only applicable to Initial waivers**

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

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**J. Appendix D4 - Conversion or Renewal Waiver Cost Projection and Adjustments. (1 of 5)**

- a. State Plan Services Trend Adjustment** the State must trend the data forward to reflect cost and utilization increases. The R1 and R2 (BY for conversion) data already include the actual Medicaid cost changes for the population enrolled in the program. This adjustment reflects the expected cost and utilization increases in the managed care program from R2 (BY for conversion) to the end of the waiver (P2). Trend adjustments may be service-specific and expressed as percentage factors. Some states calculate utilization and cost separately, while other states calculate a single trend rate. The State must

document the method used and how utilization and cost increases are not duplicative if they are calculated separately. .  
**This adjustment must be mutually exclusive of programmatic/policy/pricing changes and CANNOT be taken twice.**  
**The State must document how it ensures there is no duplication with programmatic/policy/pricing changes.**

1. ☒ [Required, if the States BY or R2 is more than 3 months prior to the beginning of P1] The State is using actual State cost increases to trend past data to the current time period (i.e., trending from 1999 to present).

The actual trend rate used is: 3.50

Please document how that trend was calculated:

Overall, rate trends as documented in Appendix D3 reflect decreases consistent with historical trends in rate setting data through SFY 2016 (July 2015 – June 2016) due to the implementation of managed care. Subsequently, positive trends have been observed in more recent rate setting data between SFY 2016 and SFY 2017 (July 2016 – June 2017). The observed trends in D3 and more recent rate setting data have been summarized in the tables below.

Prospective trend factors consistent with actuarial analysis for rate-setting were used to trend from the end of the R5 base period (June 30, 2018) to the start of the renewal waiver (July 1, 2019). The factors were based primarily on emerging trends exhibited in PIHP claims data used for rate setting purposes (see table above).

The new TBI population will be accessing many of the same services as the Innovations population and the State expects the providers of these services (qualifications, etc.) to be similar, if not the same, as those serving the current Innovations waiver participants. Thus, the trends for this MEG have been set equal to those of the Innovations MEG.

#### Appendix D3 Data

| MEG                                       | R1 to R2 | R2 to R3 | R3 to R4 | R4 to R5 |
|---|----------|----------|----------|----------|
| MEG 01 AFDC                               | 0.7%     | -13.5%   | -12.3%   | -5.4%    |
| MEG 02 Blind/Disabled and Foster Children | 3.5%     | 1.2%     | -4.4%    | -3.1%    |
| MEG 03 Aged                               | 11.9%    | 11.2%    | 3.2%     | 9.6%     |
| MEG 04 Innovations CAP-MR                 | 10.3%    | 5.9%     | -3.9%    | 2.3%     |
| MEG 05 M-CHIP                             | 13.1%    | -6.1%    | -20.6%   | -2.8%    |
| Total*                                    | 5.1%     | -0.5%    | -5.8%    | -1.4%    |

\*Total based on constant case mix with R5 MMs

#### Rate Setting PIHP Claims Data

| MEG                                       | SFY 2016 PMPM | SFY 2017 PMPM | Annual Trend |
|---|---------------|---------------|--------------|
| MEG 01 & 05 AFDC & M-CHIP                 | \$28.14       | \$29.18       | 3.7%         |
| MEG 02 Blind/Disabled and Foster Children | \$253.13      | \$262.74      | 3.8%         |
| MEG 03 Aged                               | \$62.50       | \$68.94       | 10.3%        |
| MEG 04 Innovations CAP-MR                 | \$4,553.20    | \$4,784.76    | 5.1%         |
| Total*                                    | \$110.52      | \$115.24      | 4.3%         |

\*Total based on constant case mix with SFY 2017 MMs

2. ☒ [Required, to trend BY/R2 to P1 and P2 in the future] When cost increases are unknown and in the future, the State is using a predictive trend of either State historical cost increases or national or regional factors that are predictive of future costs (same requirement as capitated ratesetting regulations) (i.e., trending from present into the future).

- i. ☒ State historical cost increases.

Please indicate the years on which the rates are based: base years. In addition, please indicate the mathematical method used (multiple regression, linear regression, chi-square, least squares, exponential smoothing, etc.). Finally, please note and explain if the States cost increase calculation includes more factors than a price increase such as changes in technology, practice patterns, and/or units of service PMPM.

For the prospective trend analysis, as discussed above, five years of waiver reported data was available to assist in the development of the trend assumptions, in addition to capitated rate-setting data. An actuarial analysis consistent with the rate-setting process was used to develop assumptions by MEG with a focus on trends in the actual PIHP claims data which should be more indicative of future rate-setting trends.

The new TBI population will be accessing many of the same services as the Innovations population and the State expects the providers of these services (qualifications, etc.) to be similar, if not the same, as those serving the current Innovations waiver participants. Thus, the trends for this MEG have been set equal to those of the Innovations MEG.

In the analysis of waiver and rate-setting trends, Mercer considers historical year over year trends, as well as rolling averages in making these estimates. No adjustments for programmatic, policy, or pricing changes were necessary; therefore, trend estimates do not duplicate the effect of any changes. The final annual trend assumptions incorporating the twelve months of actual trend from the end of R2 to the beginning of P1 as well as the prospective trend for twelve months of P1 are documented in the following chart.

| Time Period              | Trend Assumption |
|--------------------------|------------------|
| End of R5 (9/30/2017) to |                  |
| Start of P1 (7/1/19)     | 3.5%             |
| P1 (7/1/19-6/30/20)      | 3.5%             |
| Annualized Trend From    |                  |
| End of R5 to End of P1   | 3.5%             |
| P2-P5 Trend Rate         | 3.5%             |

ii. ☐ **National or regional factors that are predictive of this waivers future costs.**

Please indicate the services and indicators used. In addition, please indicate how this factor was determined to be predictive of this waivers future costs. Finally, please note and explain if the States cost increase calculation includes more factors than a price increase such as changes in technology, practice patterns, and/or units of service PMPM.

3. ☐ **The State estimated the PMPM cost changes in units of service, technology and/or practice patterns that would occur in the waiver separate from cost increase.**

Utilization adjustments made were service-specific and expressed as percentage factors. The State has documented how utilization and cost increases were not duplicated. This adjustment reflects the changes in utilization between R2 and P1 and between years P1 and P2.

i. Please indicate the years on which the utilization rate was based (if calculated separately only).

ii. Please document how the utilization did not duplicate separate cost increase trends.

## Appendix D4 Adjustments in Projection

### Section D: Cost-Effectiveness

#### Part I: State Completion Section

#### J. Appendix D4 - Conversion or Renewal Waiver Cost Projection and Adjustments. (2 of 5)

**b. State Plan Services Programmatic/Policy/Pricing Change Adjustment:** This adjustment should account for any programmatic changes that are not cost neutral and that affect the Waiver Cost Projection. For example, changes in rates, changes brought about by legal action, or changes brought about by legislation. For example, Federal mandates, changes in hospital payment from per diem rates to Diagnostic Related Group (DRG) rates or changes in the benefit



coverage of the FFS program. **This adjustment must be mutually exclusive of trend and CANNOT be taken twice. The State must document how it ensures there is no duplication with trend.** If the State is changing one of the aspects noted above in the FFS State Plan then the State needs to estimate the impact of that adjustment. *Note: FFP on rates cannot be claimed until CMS approves the SPA per the 1/2/01 SMD letter. Prior approval of capitation rates is contingent upon approval of the SPA.* The R2 data was adjusted for changes that will occur after the R2 (BY for conversion) and during P1 and P2 that affect the overall Medicaid program.

Others:

- Additional State Plan Services (+)
  - Reductions in State Plan Services (-)
  - Legislative or Court Mandated Changes to the Program Structure or fee
  - Graduate Medical Education (GME) Changes - This adjustment accounts for **changes** in any GME payments in the program. 42 CFR 438.6(c)(5) specifies that States can include or exclude GME payments from the capitation rates. However, GME payments must be included in cost-effectiveness calculations.
  - Copayment Changes - This adjustment accounts for changes from R2 to P1 in any copayments that are collected under the FFS program, but not collected in the MCO/PIHP/PAHP capitated program. States must ensure that these copayments are included in the Waiver Cost Projection if not to be collected in the capitated program. If the State is changing the copayments in the FFS program then the State needs to estimate the impact of that adjustment.
1. ☐ The State has chosen not to make an adjustment because there were no programmatic or policy changes in the FFS program after the MMIS claims tape was created. In addition, the State anticipates no programmatic or policy changes during the waiver period.
  2. ☒ An adjustment was necessary. The adjustment(s) is(are) listed and described below:
    - i. ☐ The State projects an externally driven State Medicaid managed care rate increases/decreases between the base and rate periods.  
Please list the changes.

For the list of changes above, please report the following:

- A. ☐ The size of the adjustment was based upon a newly approved State Plan Amendment (SPA).  
PMPM size of adjustment
- B. ☐ The size of the adjustment was based on pending SPA.  
Approximate PMPM size of adjustment
- C. ☐ Determine adjustment based on currently approved SPA.  
PMPM size of adjustment
- D. ☐ Determine adjustment for Medicare Part D dual eligibles.
- E. ☐ Other:  
Please describe

- ii. ☐ The State has projected no externally driven managed care rate increases/decreases in the managed care rates.
- iii. ☐ Changes brought about by legal action:

Please list the changes.

For the list of changes above, please report the following:

- A. ☐ The size of the adjustment was based upon a newly approved State Plan Amendment (SPA).

PMPM size of adjustment

- B. ☐ The size of the adjustment was based on pending SPA.  
Approximate PMPM size of adjustment

- C. ☐ Determine adjustment based on currently approved SPA.  
PMPM size of adjustment

- D. ☐ Other  
Please describe

- iv. ☐ Changes in legislation.  
Please list the changes.

For the list of changes above, please report the following:

- A. ☐ The size of the adjustment was based upon a newly approved State Plan Amendment (SPA).

PMPM size of adjustment

- B. ☐ The size of the adjustment was based on pending SPA.  
Approximate PMPM size of adjustment

- C. ☐ Determine adjustment based on currently approved SPA  
PMPM size of adjustment

- D. ☐ Other  
Please describe

- v. ☒ Other  
Please describe:

1915(b)(3) adjustment related to anticipated spending changes. TBI adjustment reflects the services provided under the TBI waiver. The TBI waiver uses many of the same services as the NC Innovations waiver and cost projections are based on the Innovations waiver.

- A. ☐ The size of the adjustment was based upon a newly approved State Plan Amendment (SPA).  
PMPM size of adjustment
- B. ☐ The size of the adjustment was based on pending SPA.  
Approximate PMPM size of adjustment
- C. ☐ Determine adjustment based on currently approved SPA.  
PMPM size of adjustment
- D. ☒ Other  
Please describe

An adequate response cannot fit into this field. Please see Section D: Cost-Effectiveness, Part I: State Completion Section, K. Appendix D5 - Waiver Cost Projection for full information.

## Section D: Cost-Effectiveness

### Part I: State Completion Section

#### J. Appendix D4 - Conversion or Renewal Waiver Cost Projection and Adjustments. (3 of 5)

**c. Administrative Cost Adjustment:** This adjustment accounts for changes in the managed care program. The administrative expense factor in the renewal is based on the administrative costs for the eligible population participating in the waiver for managed care. Examples of these costs include per claim claims processing costs, additional per record PRO review costs, and additional Surveillance and Utilization Review System (SURS) costs; as well as actuarial contracts, consulting, encounter data processing, independent assessments, EQRO reviews, etc. *Note: one-time administration costs should not be built into the cost-effectiveness test on a long-term basis. States should use all relevant Medicaid administration claiming rules for administration costs they attribute to the managed care program.* If the State is changing the administration in the fee-for-service program then the State needs to estimate the impact of that adjustment.

1. ☐ No adjustment was necessary and no change is anticipated.
2. ☒ An administrative adjustment was made.
  - i. ☐ Administrative functions will change in the period between the beginning of P1 and the end of P2.  
Please describe:

- ii. ☒ Cost increases were accounted for.
  - A. ☐ Determine administration adjustment based upon an approved contract or cost allocation plan amendment (CAP).
  - B. ☐ Determine administration adjustment based on pending contract or cost allocation plan amendment (CAP).
  - C. ☐ State Historical State Administrative Inflation. The actual trend rate used is PMPM size of adjustment

0.00

Please describe:

D. ☒ Other

Please describe:

Admin PMPM in R5 is expected to increase from \$3.14 PMPM for the 1st 4 waiver quarters to \$3.65 PMPM for P1 (based on R4 admin PMPM summarized in Appendix D3), or an increase of 16%.

The 16% includes 4% impact for 24 mos. of trend based on 2% annual trend assumption and 12% impact to annualize the R5 (8/17 – 6/18) PMPM given early quarters in the waiver period tend to be understated

- iii. ☒ [Required, when State Plan services were purchased through a sole source procurement with a governmental entity. No other State administrative adjustment is allowed.] If cost increase trends are unknown and in the future, the State must use the lower of: Actual State administration costs trended forward at the State historical administration trend rate or Actual State administration costs trended forward at the State Plan services trend rate.
- Please document both trend rates and indicate which trend rate was used.

- A. Actual State Administration costs trended forward at the State historical administration trend rate.

Please indicate the years on which the rates are based: base years

2013-2018

In addition, please indicate the mathematical method used (multiple regression, linear regression, chi-square, least squares, exponential smoothing, etc.). Finally, please note and explain if the States cost increase calculation includes more factors than a price increase.

Declining PMPM trends have been observed on admin data. Membership growth for lower cost populations are likely contributing to this PMPM decline. Given the population has reached a steady state, admin trends are anticipated to increase prospectively. The admin costs have been projected using a 2% annualized administrative trend factor.

- B. Actual State Administration costs trended forward at the State Plan Service Trend rate. Please indicate the State Plan Service trend rate from Section D.I.J.a. above

0.02

## Section D: Cost-Effectiveness

### Part I: State Completion Section

#### J. Appendix D4 - Conversion or Renewal Waiver Cost Projection and Adjustments. (4 of 5)

- d. **1915(b)(3) Adjustment:** The State must document the amount of State Plan Savings that will be used to provide additional 1915(b)(3) services in **Section D.I.H.a** above. The Base Year already includes the actual trend for the State Plan services in the program. This adjustment reflects the expected trend in the 1915(b)(3) services between the Base Year and P1 of the waiver and the trend between the beginning of the program (P1) and the end of the program (P2). Trend adjustments may be service-specific and expressed as percentage factors.

1. ☒ [Required, if the States BY is more than 3 months prior to the beginning of P1 to trend BY to P1] The

State is using the actual State historical trend to project past data to the current time period (i.e., trending from 1999 to present).

The actual documented trend is:

3.50

Please provide documentation.

To project P1 PMPMs for 1915(b)(3) services, trend consistent with State Plan levels were assumed prior to the application of the adjustment noted previously.

2. ☒ [Required, when the States BY is trended to P2. No other 1915(b)(3) adjustment is allowed] If trends are unknown and in the future (i.e., trending from present into the future), the State must use the lower of State historical 1915(b)(3) trend or States trend for State Plan Services. Please document both trend rates and indicate which trend rate was used.

**i. A. State historical 1915(b)(3) trend rates**

1. Please indicate the years on which the rates are based: base years

August 2013 through June 2018

2. Please provide documentation.

The 1915(b)(3) service utilization trends have increased in recent years and prospective trends for 1915(b)(3) services are expected to trend at levels consistent with the State Plan trends and has been set accordingly.

**B. State Plan Service trend**

Please indicate the State Plan Service trend rate from Section D.I.J.a. above

3.50

**e. Incentives (not in capitated payment) Trend Adjustment:** If the State marked **Section D.I.H.d**, then this adjustment reports trend for that factor. Trend is limited to the rate for State Plan services.

1. List the State Plan trend rate by MEG from Section D.I.I.a

2. List the Incentive trend rate by MEG if different from Section D.I.I.a

3. Explain any differences:

**Section D: Cost-Effectiveness**

**Part I: State Completion Section**

**J. Appendix D4 - Conversion or Renewal Waiver Cost Projection and Adjustments. (5 of 5)**

**p. Other adjustments** including but not limited to federal government changes.

- If the federal government changes policy affecting Medicaid reimbursement, the State must adjust P1 and P2 to reflect all changes.
- Once the States FFS institutional excess UPL is phased out, CMS will no longer match excess institutional UPL payments.

- Excess payments addressed through transition periods should not be included in the 1915(b) cost effectiveness process. Any State with excess payments should exclude the excess amount and only include the supplemental amount under 100% of the institutional UPL in the cost effectiveness process.
- For all other payments made under the UPL, including supplemental payments, the costs should be included in the cost effectiveness calculations. This would apply to PCCM enrollees and to PAHP, PIHP or MCO enrollees if the institutional services were provided as FFS wrap around. The recipient of the supplemental payment does not matter for the purposes of this analysis.
- **Pharmacy Rebate Factor Adjustment (Conversion Waivers Only) \***: Rebates that States receive from drug manufacturers should be deducted from Base Year costs if pharmacy services are included in the capitated base. If the base year costs are not reduced by the rebate factor, an inflated BY would result. Pharmacy rebates should also be deducted from FFS costs if pharmacy services are impacted by the waiver but not capitated.

*Basis and Method:*

1. ☐ Determine the percentage of Medicaid pharmacy costs that the rebates represent and adjust the base year costs by this percentage. States may want to make separate adjustments for prescription versus over the counter drugs and for different rebate percentages by population. States may assume that the rebates for the targeted population occur in the same proportion as the rebates for the total Medicaid population **which includes accounting for Part D dual eligibles**. Please account for this adjustment in **Appendix D5**.
2. ☐ The State has not made this adjustment because pharmacy is not an included capitation service and the capitated contractors providers do not prescribe drugs that are paid for by the State in FFS **or Part D for the dual eligibles**.
3. ☐ Other

*Please describe:*

1. ☒ No adjustment was made.
2. ☐ This adjustment was made. This adjustment must be mathematically accounted for in Appendix D5. Please describe

## Section D: Cost-Effectiveness

### Part I: State Completion Section

#### K. Appendix D5 Waiver Cost Projection

The State should complete these appendices and include explanations of all adjustments in Section D.I.I and D.I.J above.

1. 1915(b)(3) Adjustment - This adjustment reflects anticipated changes in 1915(b)(3) spending in the projection period. Continued implementation of the State's settlement with the US Department of Justice will result in increased 1915(b)(3) spending. Utilization of 1915(b)(3) services has continued to increase, over 20% annually in recent years, due to increased provider capacity, as well as improved awareness & promotion of these services. Additionally, three 1915(b)(3) services, in-home skill building, transitional living, and independent support, which were piloted by Cardinal Innovations in the prior waiver, will be expanded statewide to all remaining PIHPs in P1. For these reasons, the P1 projections reflect the carry-forward of the approved 1915(b)(3) PMPMs from P5 of the prior waiver period specific to each MEG necessary to support the anticipated growth of 1915(b)(3) services.
2. TBI Waiver Coverage - Effective January 1, 2018, the State seeks to implement a 1915(c) waiver to provide HCBS services to individuals with a Traumatic Brain Injury (TBI). This program will initially serve as a pilot program in the Alliance catchment area, which includes Cumberland, Durham, Johnston and Wake counties. HCBS services will be provided in lieu of Institutional services that could have been provided in Rehabilitation Hospitals, Chronic Care Hospitals or Skilled Nursing Facilities. The new TBI population will be accessing many of the same services as the Innovations population and the State expects the providers of these services (qualifications, etc.) to be similar, if not the same, as those serving the current Innovations waiver participants. Based on conversations between the State and Mercer regarding cost and utilization assumptions for the TBI population, the overall cost per member for the TBI population was assumed to be comparable to the current Innovations population. Since the new TBI population exhibits a similar cost profile to the current Innovations population, Mercer set the PMPM projections for the TBI Waiver MEG equal to the Innovations CAP-MR MEG. This is consistent with the development of the 1915(c) cost neutrality projections in Appendix J of that waiver as well.
3. 1115 waiver - NC is in discussions with CMS on a 1115 waiver that would authorize broader delivery system reforms including comprehensive managed care. The proposed 1115 waiver would phase in comprehensive managed care for the populations currently covered under this 1915(b) waiver. Once the 1115 waiver is approved and the effective dates of changes for the current 1915(b) populations are confirmed, the State will submit an amendment to the 1915(b) waiver to address required changes. No changes have currently been reflected due to the proposed 1115 waiver.

#### **Appendix D5 Waiver Cost Projection**

### **Section D: Cost-Effectiveness**

#### **Part I: State Completion Section**

#### **L. Appendix D6 RO Targets**

The State should complete these appendices and include explanations of all trends in enrollment in Section D.I.E. above.

#### **Appendix D6 RO Targets**

### **Section D: Cost-Effectiveness**

#### **Part I: State Completion Section**

#### **M. Appendix D7 - Summary**

- a. Please explain any variance in the overall percentage change in spending from BY/R1 to P2.

1. Please explain caseload changes contributing to the overall annualized rate of change in Appendix D7 Column I. This response should be consistent with or the same as the answer given by the State in Section D.I.E.c & d:

Enrollment projections are based on historical enrollment trends and expectations for enrollment changes. The changes in enrollment are primarily due to general increases in the population. The enrollment change for the Innovations - CAP-MR MEG considers the slot increases planned for this population under the concurrent 1915(c) waiver.

Since the new M-CHIP population exhibits similar risk as the AFDC population, Mercer assumed the M-CHIP MEG would trend at the same level as the AFDC MEG.

Effective January 1, 2017, the State seeks to implement a 1915(c) waiver to provide HCBS services to individuals with a Traumatic Brain Injury (TBI). This program will initially serve as a pilot program in the Alliance catchment area, which includes Cumberland, Durham, Johnston and Wake counties. HCBS services will be provided in lieu of Institutional services that could have been provided in Rehabilitation Hospitals, Chronic Care Hospitals or Skilled Nursing Facilities. A new TBI Waiver MEG was built into the waiver to track these individuals separately. Mercer utilized the requested waiver slots for the 1915(c) waiver to assign enrollment for this MEG (49 and 99 eligibles for the first and second year, respectively).

Since the new TBI population will be accessing many of the same services as the Innovations population and the State expects the providers of these services (qualifications, etc.) to be similar, if not the same, as those serving the current Innovations waiver participants, Mercer assumed the TBI Waiver MEG would trend at the same level as the Innovations CAP-MR MEG.

2. Please explain unit cost changes contributing to the overall annualized rate of change in Appendix D7 Column I. This response should be consistent with or the same as the answer given by the State in the States explanation of cost increase given in Section D.I.I and D.I.J:

The annualized rate change reflects both trend and other adjustments. In the analysis of waiver and rate-setting trends, Mercer considers historical year over year trends, as well as rolling averages in making these estimates. In the historical R1 through R5 time period, no major programmatic changes called for an adjustment to our trend data; therefore trend estimates would not duplicate the effect of any changes.

3. Please explain utilization changes contributing to the overall annualized rate of change in Appendix D7 Column I. This response should be consistent with or the same as the answer given by the State in the States explanation of utilization given in Section D.I.I and D.I.J:

The annualized rate change reflects both trend and other adjustments. In the analysis of waiver and rate-setting trends, Mercer considers historical year over year trends, as well as rolling averages in making these estimates. In the historical R1 through R5 time period, no major programmatic changes called for an adjustment to our trend data; therefore trend estimates would not duplicate the effect of any changes.

As discussed previously, an adjustment in P1 was made to account for anticipated changes in 1915(b)(3) spending in the projection period. Additionally, an adjustment to account for lower administrative spend exhibited in R5 PMPMs was applied for P1. These adjustments contribute to the larger change reflected from R5 to P1.

- b. Please note any other principal factors contributing to the overall annualized rate of change in Appendix D7 Column I.

## Appendix D7 - Summary